



# Local Allocations Master Plans Consultation Report

## Part 2

Contains the results:

- List of Respondents
- Number of Representations
- Main Issues Raised and Council's Response

2015

This publication is **Part 2 of the Consultation Report on the Local Allocations Master Plans**: it contains the results of the consultation on the Local Allocations Master Plans.

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

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# CONTENTS

	<b>Page No.</b>
<b>PART 1 (see separate document)</b>	
1. Introduction	1
2. The Council's Approach	3
3. Notification and Publicity	5
4. Results	7
5. Summary of the Main Issues	8
6. Changes Proposed	20
<b>ANNEX A: METHOD OF NOTIFICATION</b>	<b>22</b>
<b>Appendices:</b>	
Appendix 1: Advertisements and Press Articles	23
Appendix 2: Dacorum Digest articles	31
Appendix 3: Example of Display Material for Exhibitions	34
Appendix 4: Organisations and Individuals Contacted	40
Appendix 5: Sample Notification Letters	53
Appendix 6: Cabinet Report	58
Appendix 7: Minutes of Key Meetings	73
<b>PART 2 (this document)</b>	
<b>ANNEX B: RESULTS</b>	
	<b>Page No.</b>
Table 1 – List of Groups / Individuals from whom Comments were received	4
Table 2 – Breakdown of comments received	18
Table 3 - Main Issues Raised and Council's Response	19

**Table 1 – List of Groups / Individuals from whom Comments were received**

Notes: Includes both supporting and objecting comments.

**Master Plan LA1 - Who Responded**

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
334036	Cllr Terry Douris				
777278	Miss Caroline Sabberton	Sustainable Places Specialist Environment Agency			
867055	Cllr Ann Ryan				
398598	Mrs Anne Fisher				
867074	Mrs Christine Penny				
864449	Mr Kevin Minier				
56252	Mr Tom Gilbert-Wooldridge	Principal Historic Environment Planning Advisor Historic England			
864453	Mr Dennis Harvey				
863373	Mr Geoffrey Walke				
871197	Mrs Janet Curtis-O'Brien				
772477	Mr. Roy Warren	Planning Manager Sport England			
331221	Mr Martin Hicks				
358659	Mrs Iris Mayes				
866815	Mr Robert Garwood				
621304	Mrs Jennifer Wright				
869513	Mr Jerome O'donohoe				
618660	Mrs Julia Baird				
864965	Mrs Patricia Lamb				
871157	Mr Terence O'Brien				
869707	Mr Stephen Penny				
869574	Mrs Linda Gold				
869676	Mr Micheal Bean				

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
871209	Ms Judy Wade				
871214	Mr J.A. Wheedon				
871353	Mr Paul Borg				
405276	Mrs Sophie Burtenshaw				
871356	Mr Michael Devlin	Chairman Grovehill Futures			
866203	Mr Nick Gough				

**Master Plan LA2 - Who Responded**

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
534748	Mrs Patricia Jefferson				
619474	Miss Brenda Mariner				
56252	Mr Tom Gilbert-Wooldridge	Principal Historic Environment Planning Advisor Historic England			
777278	Miss Caroline Sabberton	Sustainable Places Specialist Environment Agency			
211544	Mr Jake Quintin Leith				
866203	Mr Nick Gough				
620282	Mr Paul Sheehy				
772477	Mr. Roy Warren	Planning Manager Sport England			
331221	Mr Martin Hicks				

**Master Plan LA3 - Who Responded**

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
776188	Ms Hilary Passi				
776167	Mrs Christine Ridley				
315503	Horsfall				
489819	Mr Gruff Edwards	Chair Dacorum Environmental Forum			
864188	Mrs Sharon Nicoll				
772477	Mr. Roy Warren	Planning Manager Sport England			
863812	Mrs Marion Adams				
774187	Mr Trevor Liddle				
772240	Mrs Sue Davis				
864365	WHAG	Chair West Hemel Action Group	864362	Mr Lee Royal	Chair West Hemel Action Group
864369	Mr Mike Ridley				
777080	Mr Alex Tonello				
777106	Mr Tony Carroll				
864685	Ms H Matthews				
777052	Miss Stephanie Wallis				
775876	Mr Henry Wallis				
864732	Mr Tim Thompson				
775883	Mrs Carolyn Wallis				
864742	Prof Roderick bugg				
777146	Mrs ann pattinson				
775887	Mrs Joyce Beadle				
864731	Norton				
864906	Mrs Kate Bedford				
864899	Mrs Donna Lee				
864862	MRS FRANCES BUGG				
864988	Mr Colin Arnott				

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
864901	Mr Leo Bedford				
772055	Mrs Nicola Menzies				
865109	MRS SALLY Prue				
864982	Mrs Jacqueline Marie Horwood				
777111	Mr Alistair Drummond				
485861	Mr Cornelius Nicoll				
865079	Mr Pete Crawley				
865076	MR SIMON BELSON				
776766	Mr Roger Prue				
864975	Mr James Collins				
776939	Mr Siva Niranjana				
56252	Mr Tom Gilbert-Wooldridge	Principal Historic Environment Planning Advisor Historic England			
772087	Miss Rebecca Tyne				
769545	Mr Jonathan Owen				
865143	Mrs Jacqueline Coe				
865006	Mrs Alice Crawley				
334036	Cllr Terry Douris				
223914	Mrs Nichola Mills				
211625	Mr Gardener		611650	Mr John Heginbotham	Director Stimpsons
865138	Mrs Anne Lyne				
777282	Mr Richard Lyne				
483039	Mr John Gross				
867296	Miss Sarah Redmond-Taylor				
865182	Mrs Diana Lai				
771821	Mr Stephen Tyne				
777786	Ms Sophie Horwood				
867290	Mr Simon Redmond-Taylor				



Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
777086	Mrs Julie James				
867770	Ms Jessica Brooks				
223869	Mr Jorg Normann				
867321	Mr Phil Higgins				
761274	Mr Peter Mannell				
211503	Mr Colin White	Planning Officer Chilterns Conservation Board			
211531	Ms Anna Barnard				
224451	Mr Kelvin Clayson				
496443		Grand Union Investments	305509	Ms Jane Barnett	
502739	Mr Chris Elvin				
610088	Mr Martin Hicks	Ecology Officer Hertfordshire County Council			
611329	Mr Derek Proctor				
611329	Mr Derek Proctor		864650	Mr Derek Bromley	
760583	Mr Ben Coles		210999	Mr Martin Friend	Director Vincent & Gorbing
774832	Mrs Irene Chard				
774843	Ms Jennie Sewell				
775464	Mr Ian Laidlaw-Dickson				
775670	Miss Mary McDowall				
776808	Mr John Proctor				
777041	Mrs Patricia Whitaker				
777115	Mrs Alison Rumble				
777245	Ms Dorothy Jackman				
777278	Miss Caroline Sabberton	Sustainable Places Specialist Environment Agency			
777292	Mr Simon Barnard				
777293	Mr Philip Ashworth				
777392	Mrs Carol Veal				

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
777521	Mr Colin Veal				
777591	Mrs Sandy Walpole				
777592	Mrs Sarah Alexander				
864702	Cllr Fiona Guest				
865065	Ms Colette Bidwell				
866203	Mr Nick Gough				
867771	Mr Jacob Barrie				
868189	Mrs Betty Copperwhite				

**Master Plan LA4 - Who Responded**

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
494010	Mrs Catherine Imber				
610088	Mr Martin Hicks	Ecology Officer Hertfordshire County Council			
496443		Grand Union Investments	305509	Ms Jane Barnett	
866203	Mr Nick Gough				
777278	Miss Caroline Sabberton	Sustainable Places Specialist Environment Agency			
610662	Mr Antony Harbidge	Chairman Berkhamsted Residents Action Group (BRAG)			
610637	Mr Richard Sears	Facilities Manager BFI			
56252	Mr Tom Gilbert-Wooldridge	Principal Historic Environment Planning Advisor Historic England			
864965	Mrs Patricia Lamb				

**Master Plan LA5 - Who Responded**

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
863583	Mr Thomas Lynch				
863570	Mr Matt Duncan				
863564	Mr Patrick D'Alton Harrison				
863317	Mr John Allan				
861395	Mr Ian Burrus				
860822	Me Neil Churchley				
860812	Mrs Claire Caton				
863687	Cllr Carole Paternoster				
863761	Mr Andrew Sangster				
863910	Mr Stuart Parker				
864736	Mrs Susan Marshall				
864107	Mr Antony Hetherington				
864907	Mr Richard Lea				
772477	Mr. Roy Warren	Planning Manager Sport England			
864388	Buckland Parish Council	Clerk Halton Parish Council			
864722	Miss Jenefer Rainnie				
864730	Mr Stephen Doughty				
865058	Mrs Jo Jameson				
864871	Mrs Lydia Whelan				
865014	Mr Robert Turnbull				
865009	Mr Keith Everett				
865060	Miss Julie Stefan				
865037	Mrs Andrea Lane				
865039	Mrs. Sue Yeomans				
334233	Mr Michael Gillen				
865149	Mr Robin Jarvis				

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
865159	Mr Nicholas Hollinghurst				
865067	Mr Andrew McKechnie				
610050	mrs. Maria potter				
864903	Mr Andy Butterworth				
865176	Mr Cottle Cottle				
864905	Mrs Vicky Butterworth				
865165	Mrs Rosemarie Hollinghurst				
869182	Mr & Mrs Jonathan Beck				
865139	gething				
865171	Ms Caroline Evans				
869243	Mrs Michelle Smith				
865142	Mrs Sandra Hill				
869000	Mr and Mrs Jonathan and Valentina Lock				
869136	Ms Ann Hetherington				
217807	Mrs Claire Crouchley	Parish Clerk Wigginton Parish Council			
869543	Cllr Christopher Townsend				
869548	Mr Christine Garvey				
869154	Mr & Mrs Alan & Jane Lofty				
869552	Mr Chris Gregory				
869553	Mr Bruce Bettridge				
869561	Mrs Beth Townsend				
865186	Mrs Kate Steel				
869575	Mr & Mrs Clarke				
869261	Ms Sandra Smith				
211503	Mr Colin White	Planning Officer Chilterns Conservation Board			
869492	Mrs Wendie Claridge				
869785	Mr & Mrs James & Sally Paul				

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
869789	Mrs Margaret Whiting				
869141	Mr & Mrs John & Janet Bax				
869792	Miss Clara Whilett				
869573	Mrs Barbara Somerville				
869795	Mr Marc Simpson				
870230	Mr Philip Owens				
610088	Mr Martin Hicks	Ecology Officer Hertfordshire County Council			
869787	Mr Martin Phillips				
870289	Mr Sukhraj Sohal				
870331	Mr Rob Schafer				
870346	Mr Philip Scribbins				
865057	MR Simon Gilbert				
211488	Ms Alison Cockerill				
211591	Ms Ailsa Morris				
224202	Mrs Ruth Hart				
226201	Mr rogan gething				
332339	Mrs Pat Allison				
398225	Mr David Broadley	Aylesbury Vale District Council			
398585	Mrs Susan Andrews				
398594	Mr & Mrs Keith & Dawn Slade				
398611	Dr Robert Woodman	Drayton Beauchamp Parish Meeting			
398704	Mrs Frances Turan				
400454	Mr Claude Honey				
488649	Mr Colin Simpson				
777278	Miss Caroline Sabberton	Sustainable Places Specialist Environment Agency			
859133	Mrs Alison mcdermott				
864253	Mr Gordon McAndrew				
864970	Mr John Roper				

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
865042	MR BARRY SIMMONS				
865059	Mr Martin Gray				
865070	Mr Matthew Turton				
866203	Mr Nick Gough				
868491	Mr Graham Hoad				
868541	Mr Michael Curry	Town Clerk Tring Town Council			
868955	Mr Richard Allison				
869019	Mrs Shelley Savage				
870272	Mrs Thacker				
870370	Mr Mark Holderness				
870398	Mr Nick Ingle				
870437	Mr & Mrs James				
870953	Mrs J. Draper				
870981	Mr Lewis Smith				
871121	Mr Ian Coburn				
871229	Mrs Helen Veerou				
871291	Mr John Bloxham				
871294	Mrs Natalia McIntosh				
871298	Mrs Deborah Lea				
871307	Mrs Samantha Davis				
871309	Mr J.A. Harper				
871311	Mr Stephen Kitchener				
871312	Mr Saeed Moosa				
871313	Mr & Mrs Dilworth				
871314	Mr Ron Schafer				
871361	Mrs Laurianne Sells				
871411	Mr Leslie Barker				
871418	Mrs Yvonne Dean				

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
871432	Telephone Exchange		871424	Mr Satish Jassal	
871443	Mr & Mrs Rouse				
871446	Mr Thomas Lloyd				
871449	Mrs Tamzin Green				
871454	Mrs Suzanne Fitch				
871458	Mr & Mrs Sanders				
871487	Mrs Amanda Croggon				
871488	Mr Anthony Butler-Lee				
871517	Mr Allan Freeman				
871531	Mrs Patricia Coburn				
871537	Mr Mark Lucas				
871543	Mr John Claridge				
871550	Mr John Downing				
871558	Mr Paul Hart				
871563	Mrs Sheila Savage				
871575	Mr & Mrs Richard and Karintha Calverley				
871616	Miss Mary Bates				
871617	Mr Stuart Croggon				
871620	Mrs Gillian Walker				
871624	Mr / Mrs Dennis Guy				
871625	Mrs Clare Francis				
871627	Mr David Reece				



**Master Plan LA6 - Who Responded**

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
334983	Mr Peter Summerfield				
866203	Mr Nick Gough				
868999	Mr & Mrs Stewart				
610618	Miss Lindsey Coates	secretary / vice chair The Mount Residents Association			
777278	Miss Caroline Sabberton	Sustainable Places Specialist Environment Agency			
743858	Mr Paul Phipps	Whiteacre Ltd			
866391	Mrs Jenny Summerfield				

**Table 2 – Breakdown of Comments Considered**

Notes:

<sup>1</sup> Data regarding the number of responses to individual questions is not provided due to the amount of overlap between answers to the questions

<sup>2</sup> The sum of the number of people/organisations objecting and supporting does not necessarily equal the total number commenting as some people/organisations supported some parts of the master plans and objected to the parts and are thus counted in both tallies.

Local Allocation Master plan	Number of people/ organisations commenting	Support				Object			
		Key Organisations	Individuals	Land Owners	Total	Key Organisations	Individuals	Land Owners	Total
LA1	28	1	1	0	2	4	22	0	26
LA2	9	3	1	0	4	3	4	0	7
LA3	88	2	2	3	7	6	71	4	81
LA4	8	2	0	0	2	4	1	1	6
LA5	130	7	8	0	15	6	117	1	124
LA6	7	1	0	0	1	2	4	0	6
Total	270	-	-	-	-	-	-	-	-

**Table 3 - Main Issues Raised and Council's Response**

Note: This provides a synopsis of the main issues raised through the representations and the Council's response to these. Its primary focus is therefore upon objections rather than statements of support.

ISSUE: Master Plan: Local Allocation LA1																		
<p><b>Number of people/organisations responding</b>     28</p> <p><b>Supporting -</b></p> <table border="0"> <tr> <td>Key organisations</td> <td>1</td> </tr> <tr> <td>Individuals</td> <td>1</td> </tr> <tr> <td>Landowners</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>2</b></td> </tr> </table> <p><b>Objecting -</b></p> <table border="0"> <tr> <td>Key organisations</td> <td>4</td> </tr> <tr> <td>Individuals</td> <td>22</td> </tr> <tr> <td>Landowners</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>26</b></td> </tr> </table>			Key organisations	1	Individuals	1	Landowners	0	<b>Total</b>	<b>2</b>	Key organisations	4	Individuals	22	Landowners	0	<b>Total</b>	<b>26</b>
Key organisations	1																	
Individuals	1																	
Landowners	0																	
<b>Total</b>	<b>2</b>																	
Key organisations	4																	
Individuals	22																	
Landowners	0																	
<b>Total</b>	<b>26</b>																	
<p><b>NOTE. Some local residents wishing to raise concerns regarding the LA1 development did so by responding to the consultation on Policy LA1 of the Pre-Submission Site Allocations document, which ran in parallel to that for the master plans. Please refer to separate Report of Representations for a summary of issues raised and the Council's response.</b></p> <p><b>NOTE: Paragraph numbers referred to in the responses below relate to those of the September 2014 version of the master plan for LA1.</b></p>																		
Issue	Response	Amendment required – yes or no																
<b>Organisations</b>																		
<i>Organisations who disagreed made the following comments:</i>																		
<p>English Heritage (now Historic England):</p> <ul style="list-style-type: none"> <li>- Local allocation would be within the setting of Piccotts End Conservation Area (located 300 metres away from the prominent hillside development site).</li> <li>- Propose a 15 metre as opposed to 10-metre planted buffer on the new settlement edge which would be visible from Piccotts End.</li> <li>- Mix of 2 and 3 storey buildings – propose a limit of 2.5 storeys for new dwellings.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>Change required</b> – These concerns were raised and considered through the preparation of the Core Strategy and have therefore been taken into account by the Council and Planning Inspector when considering the suitability of this site for development. The Council recognises that it is important to minimise the impact of the development on the archaeological and heritage assets surrounding LA1.</li> </ul> <p>It is satisfied that these matters are appropriately recognised and addressed through Policy LA1 but acknowledge that the Master Plan would be the appropriate document to provide further recognition of the nearby Conservation Area and the development principles which should be considered through the preparation of any planning application for development of the site. In particular, this should include reference to the form of the development, taking account of its position within the local topography, and protection to be afforded to the character of Piccotts End through the provision of a soft planted edge to ensure a physical and visual separation between the two settlements. In line with proposed changes to Policy LA1 of the Site Allocations document, the Council will also ensure consistency of references to building heights, limiting them to two storeys except where a higher element would create interest in the street scene having regard to topography, visual impact and impact on the setting of designated heritage assets as a result of any such element.</p> <ul style="list-style-type: none"> <li>- <b>Change required</b> – A planted buffer of at least 10m buffer is considered an appropriate depth in order to safeguard the setting</li> </ul>	<p>Yes.</p>																

	<p>of the Conservation Area, as the provision of such a buffer is likely to provide sufficient separation and visual screening between the development and the Conservation Area. However, it is recognised that any such buffer should not form an 'unnatural' straight delineation of trees and that a degree of flexibility should be added to the Master Plan requirements to ensure a 'natural' planting design with soft edges is incorporated. As such the Council recognises that this could vary in depth along the western boundary of the site (albeit that this should ideally be no less than 10 metres in depth). The design and implementation of any such buffer/tree belt should be considered alongside any contribution from the existing landscaping within the site, the role of new planting as part of the LA1 development, the need for development to follow the topography of the site, and through careful design and layout of the new housing. This design should therefore be informed by a Heritage Statement and Conservation Area Appraisal to assess the impact of the development and appropriate levels of mitigation, which should be submitted in support of a planning application.</p> <p>- <b>Change required</b> – In terms of buildings heights, whilst it is envisaged that the majority of the development will be two storey in height, it is reasonable to have some limited taller elements to add visual and design interest within the development, but only where this is appropriate taking account of site topography. The Council does not want to hinder innovative designs by limiting heights to 2 ½ storeys only. It is accepted that this issue would benefit from clarification. The 'Key Development Principles' section of Policy LA1 currently has two separate requirements relating to design. These are as follows:</p> <ul style="list-style-type: none"> <li>• <i>“Deliver a mix of two storey and three storey housing including 40% affordable homes; and</i></li> <li>• <i>Limit buildings to two storeys, except where a higher element would create interest and focal points in the street scene.”</i></li> </ul> <p>It is accepted that a clearer wording would be as follows:</p> <ul style="list-style-type: none"> <li>• <i>“Deliver a mix of housing, including 40% affordable homes; and</i></li> <li>• <i>Limit buildings to two storeys, except where a higher element would create interest and focal points in the street scene and is appropriate in terms of topography and visual impact.”</i></li> </ul> <p>The wording of the draft masterplan should also be amended to reflect these changes. The masterplan elaborates on these principles by stating that <i>“The issue of the development’s visibility should be mitigated by careful siting of taller buildings and prominent roof forms to parts of the site that are more discreet, such as those at lower levels.....”</i> The design and layout of the new development will also have to accord with the design policies of the Core Strategy, which cover a range of geographical scales from 'Quality of Settlement Design (Policy CS10), to 'Quality of Neighbourhood Design' (Policy CS11) and 'Quality of Site Design' (Policy CS12). These policies require consideration to be given to key issues such as protection and enhancement of significant views, reinforcing topography and taking account of more detailed factors such as the scale, height and bulk of individual buildings.</p>	
<p>Environment Agency:</p> <ul style="list-style-type: none"> <li>- Approximately half the site (western extent) lies within Source Protection Zone 3 which means that the groundwater feeds potable water supplies. Measures are required to ensure that further contamination of groundwater does not occur as a result of this development. Infiltration systems should have a suitable series of treatment steps to prevent pollution.</li> <li>- Opportunities should be sought through this development to tackle known surface water flooding issues (including along Link Road) – space will need to be allocated around the site for this purpose.</li> <li>- Hertfordshire is an area of extreme water stress due to high demand and limited resources – water efficiency measures should be incorporated into the housing design.</li> <li>- Howe Grove Wood is a Local Nature Reserve (LNR) and there is a need to ensure existing hedgerows and ecological corridors are maintained.</li> <li>- Happy with the sustainable drainage basin but it alone is</li> </ul>	<ul style="list-style-type: none"> <li>- <b>No change</b> – The Council notes the groundwater sensitivities in this area and has already highlighted the need for the developer to complete a Land Contamination Assessment Phase 1 Report to be submitted with any forthcoming planning application. Within this assessment it is hoped that the impact of the proposed development on groundwater will be assessed and any necessary mitigation measures identified for inclusion within the development design, including any infiltration systems with treatment if necessary.</li> <li>- <b>Change required</b> – As a result of the background work for the Pre-submission Site Allocations DPD and Master Plan for LA1, the issue of flooding has been assessed through the Strategic Flood Risk Assessment Stage 1 (2007) and subsequently a Stage 2 SFRA (completed by in 2008). Whilst the site is not located within any flood risk zone from fluvial sources, as stated within the draft master plan, there is in fact an area across the site affected by surface water flooding according to the Environment Agency’s flood risk maps. Therefore, it would be prudent to clarify the risk of flooding from all sources and as such suggest a modification to the master plan to ensure the development is designed accordingly to minimise, as opposed to exacerbate, any flood risk to existing and new residents. Nevertheless, any planning application will need to be accompanied by a site-specific flood risk assessment which will re-assess flood risk from all sources and identify appropriate mitigation/design requirements.</li> <li>- <b>No change</b> – The developer will be required to demonstrate compliance with Core Strategy Policy CS29 (specifically part (b) in regard to the consumption of water resources during construction and part (e) to limit residential water consumption to 105 litres per person per day) and in doing so they will be expected to submit a Sustainability Statement and carbon compliance</li> </ul>	<p>Yes</p>

<p>unlikely to be able to attenuate all surface water from the site. Need a commitment to a variety of SuDS being used to manage surface water across the whole site to ensure greenfield run-off rates achieved – e.g. swales, permeable paving or gravel.</p>	<p>checklist in support of any planning application for the development of LA1 (paragraph 18.22 of the Core Strategy). This will be assessed at the planning application stage and the Environment Agency will be consulted during that process. Additionally, details regarding the implementation of home-specific water efficiency measures will be the subject of regulations outside of the town and country planning remit. Specifically, following withdrawal of the Code for Sustainable Homes, the developer will be required demonstrate compliance with the Building Regulations 1984 (as amended) which now includes a need to ensure the provisions for renewable energy, water efficiency measures and off-site carbon abatement measures for developments of 10 units or more (as inserted following enactment of the Infrastructure Act 2015).</p> <ul style="list-style-type: none"> <li>- <b>Change required</b> – It is recognised that Howe Grove Wood is statutorily designated as a Local Nature Reserve, however this is not explicitly stated within chapter 3 of the master plan (Analysis of Site). Therefore, it would be prudent to clarify this within the document. Nevertheless, paragraph 3.9 of the master plan does recognise the need to maintain wildlife/ecological corridors across the site to ensure connectivity with Howe Grove Wood as well as Margaret Lloyd Park and the wider surrounding countryside.</li> <li>- <b>No change</b> – The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy (Policy LA1 of the Pre-submission Site Allocations DPD). Although the precise wording will need to be reviewed in the light of recent announcements by Government regarding how flooding issues will be taken into account as part of the development process, the general approach remains sound. The SuDS feature shown on the concept plan to LA1 is indicative only. Surface water drainage will be considered in detail, including the implementation of appropriate SuDS measures where technically feasible, alongside the planning application for the new homes. This will be a validation requirement at the planning application stage. Further advice will be taken form the Local Lead Flood Authority (LLFA), as well as the Environment Agency, as part of pre-application discussions.</li> </ul>	
<p>Sport England:</p> <ul style="list-style-type: none"> <li>- No inclusion of community sport facilities that should be funded through CIL or S106 contributions.</li> <li>- Policy CS23 expects all new development to contribute towards the provision of social and community infrastructure which includes sports facilities.</li> <li>- New residential development will generate further pressure on existing facilities which may already be at capacity. New residential development should therefore meet additional needs (either on-site or via financial contributions).</li> </ul>	<ul style="list-style-type: none"> <li>- <b>Change required</b> – In light of recent Government changes to the National Planning Practice Guidance (NPPG) in regard to Planning Obligations, the Council notes the need to amend the Pre-submission Site Allocations DPD and associated master plans accordingly to reflect changes to how financial contributions are sought through either the Community Infrastructure Levy (CIL) or, on a more limited basis, Section 106 of the Town and Country Planning Act 1990 (as amended). The Council agreed to adopt its CIL Charging Schedule, Regulation 123 List and policies on Exceptional Circumstances Relief, Discretionary Charity Relief, and Instalments and Payments in Kind on 25<sup>th</sup> February 2015. The new CIL charging regime will be implemented on 1<sup>st</sup> July 2015. <i>[Note: planning applications submitted from the 4<sup>th</sup> May 2015 (8 weeks prior to the 1<sup>st</sup> July 2015) will be required to complete and submit a CIL Additional Information Form as a validation requirement].</i></li> </ul> <p>In terms of the impact of the proposed development on existing social and community infrastructure and facilities, the proposal seeks to provide a Locally Equipped Area of Play (LEAP) within the site and will also seek financial contributions toward off-site enhancements to existing social and community facilities. Any CIL collected from the developer could be spent on either Green Infrastructure and Open Space, including outdoor sports pitches, or Other Social and Community Facilities, such as indoor sports and leisure facilities, in accordance with the Council's adopted Regulation 123 List. The Council have also recently completed an Outdoor Leisure Facilities Playing Pitch Strategy and Action Plan following completion of an assessment report in September 2014. This document will provide a platform for the Council as a whole to direct investment for social and community infrastructure improvements/provisions and to also inform the New Local Plan which could identify the provision of new facilities where they are evidently required. In view of this, the Council recognises the need to clarify how any financial contributions sought as a result of this development could be spent on social and community infrastructure. Albeit that the decision of allocating CIL funds to infrastructure improvements will be taken by the Council's Infrastructure Advisory Group.</p> <p>The following additional bullet point under paragraph 7.6 of the master plan is therefore proposed as a modification:</p> <ul style="list-style-type: none"> <li>- <i>'Social and community infrastructure – including the provision of a Locally Equipped Area of Play (LEAP) on the site and contributions toward other facilities where a need is identified.'</i></li> <li>- Local Ward Councillors in Grovehill will also receive a meaningful proportion of any CIL contributions (15%) and the allocation of such funds to local infrastructure projects, which might include community sports facilities, will be made at this governance level in consultation with local residents. The Grovehill Future Neighbourhood Forum is also currently drafting their Neighbourhood Plan. Once this Neighbourhood Plan is 'made', the allocation of meaningful proportion will increase to 25% of</li> </ul>	<p>Yes</p>

	any CIL funds.	
Grovehill Futures Neighbourhood Forum:	<p><b>Change required:</b></p> <ul style="list-style-type: none"> <li>- <i>See response below under 'Change in proposed number of homes from 300 to 350'.</i></li> <li>- <b>No change</b> – In preparing the Pre-submission Site Allocations DPD and associated master plans, the Council has been engaging with, and consulting, Hertfordshire County Council's Gypsy and Traveller Unit. They have advised the best approach to meeting the needs of the local Gypsy and Traveller population. In doing so, they have stated that sites that are owned and managed publicly are allocated to residents appropriately from the waiting list which is maintained by the County Council. It is recognised that new sites are required and this is the most practical way of providing them and that all occupants of these sites enter into a 'secured tenancy agreement' with the County Council.</li> </ul> <p>A brief summary of the process the Council has been through with regards to considering and assessing potential Gypsy and Traveller sites is set out in the Issues Paper the Council prepared for the Core Strategy Examination: <a href="http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement---dacorum-borough-council.pdf?Status=Master&amp;sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement---dacorum-borough-council.pdf?Status=Master&amp;sfvrsn=0</a>. This clearly explained to the Inspector the Council's proposed approach of setting strategic policies (plus a monitoring target for new pitch provision) through the Core Strategy and identifying precise pitch locations and requirements on the three largest Local Allocations (LA1, LA3 and LA5) through the Site Allocations. The specialist consultants who prepared the Council's latest Traveller Needs Assessment (ORS) stated that the incorporation of new sites within new urban extensions was emerging as a 'good practice' approach. Therefore, 5 permanent pitches will be provided on the LA1 site.</p> <p><i>See also response under 'Provision of Gypsy and Traveller site within LA1'</i></p> <ul style="list-style-type: none"> <li>- <b>Change required</b> – Through the consultation exercise on the Pre-submission Site Allocations DPD and associated master plans, residents identified the existence of an informal footpath from the Link Road to Margaret Lloyd Park which traverses to the rear of residential properties on Severnmead. This is not an adopted or permissive right of way but nonetheless appears to provide a well-used pedestrian access to Margaret Lloyd Park and existing residential properties. Therefore it would be appropriate to reflect this pedestrian link on the Site Constraints and Opportunities map (Figure 8) and seek to incorporate it into the site design in accordance with the Green Space and Transport development principles identified within the master plan. This would be a particularly key access route in terms of connectivity of the development and consequently access to Margaret Lloyd Park and any new bus stop provided on the Link Road as a result of this development (details of which will be provided in subsequent stages of the planning process).</li> <li>- <b>No change</b> – In terms of the size of dwellings to be provided on site, the Key Development Principles set out in Policy LA1 of the Pre-submission Site Allocations DPD and Homes Principles set out within the master plan indicate the need to deliver a mix of housing and provides sufficient flexibility for the developer and Council to deliver the homes required without being unnecessarily prescriptive.</li> </ul> <p><i>See also response to English Heritage (now Historic England), including proposed amendment to clarify housing to be delivered through the development of LA1, and under 'Housing mix/tenure' regarding affordable homes.</i></p> <ul style="list-style-type: none"> <li>- <b>No change</b> – With regard to the provision of renewable energy and need to provide sustainable development, the proposed development will need to meet the requirements of Core Strategy Policy CS29 including the need to (g) maximise the energy efficiency performance of the building fabric in accordance with the energy hierarchy (Figure 16 of the Core Strategy). This may include the provision of solar panels (photovoltaics) or rainwater harvesting goods to provide a source of renewable energy, however, at this stage the Council do not wish to be particularly prescriptive over how the developer achieves energy efficiency within the development. As noted in paragraph 6.4 of the master plan, the developer will be required to submit a Sustainability Appraisal and Energy Statement which will include such details and will therefore be assessed at the planning application stage. A developer will also have to comply with other legislative requirements outside of the planning system including the Building Regulations 1984 (as amended). This incorporates the need to ensure the provisions for renewable energy, water efficiency measures and off-site carbon abatement measures for developments of 10 units or more (as inserted following enactment of the Infrastructure Act 2015).</li> <li>- <b>No change</b> – In terms of the site layout of LA1, the designing of bin storage space and car parking for each new home is too detailed for Policy LA1 and associated master plan to address at this stage and will be developed at a later stage in the planning process. Nevertheless, the proposed development will need to accord with relevant development plan policies relating to car parking provision, including Core Strategy Policy CS8 (Sustainable Transport), saved Local Plan Policies 57 and 58 as well as Appendix 5 of the Local Plan (1991-2011). Regard will also need to be given to relevant supplementary planning guidance and</li> </ul>	Yes

	policy guidance notes including the Council's Refuse Storage Guidance Note (2015) and Accessibility Zones – Parking Standards (2002). Both of these can be found on the Council's website at: <a href="http://www.dacorum.gov.uk/home/planning-development/planning-applications/development-advice-notes-guidance">http://www.dacorum.gov.uk/home/planning-development/planning-applications/development-advice-notes-guidance</a> .	
<i>Organisations who agreed made the following comments:</i>		
Hertfordshire County Council – Local Highway Authority: - HCC Highways have been engaged throughout the process of drawing up these master plans and supports proposals for supporting infrastructure.	<b>No change.</b> Support noted.	No
<b>Individuals</b>		
<i>Individuals who disagreed made the following comments:</i>		
Principle of development: - Could use Grovehill ( <i>previously developed land</i> ) and build in few areas to make up that number (housing number) without using green belt. - Need to development on Green Belt.	<b>No change.</b> <u>Principle of Development:</u> The Council has taken time and care to identify what are considered, on balance, to be the most appropriate sites to bring forward for new housing. The decision to allocate the six Local Allocations for development has been taken in the context of the National Planning Policy Framework (NPPF), as this was published in advance of the Core Strategy examination. This requires, amongst other things, for Councils to ' <i>positively seek opportunities to meet the development needs of the area</i> ' (para 14); and ' <i>boost significantly the supply of new housing</i> ' (para 47).  The decisions made regarding both the overall level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The Examination was presided over by a Planning Inspector independent of the Council, who was aware of the concerns raised by local residents over the scale, location and potential impacts of new homes planned; particularly with regard to the Local Allocations. However, the Inspector's Report concludes that the Green Belt housing sites were appropriate and are required to help meet the planned level of housing and local housing needs. It is important to note that the Inspector's main concern when weighing up whether or not to find the Core Strategy 'sound' or not, was if the Council had allocated <i>sufficient</i> land for housing, not if any of the Green Belt sites should be removed from the plan.  The principle of releasing land from the Green Belt and bringing forward this site for housing and associated uses has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.  <u>National Planning Practice Guidance Update:</u>  The Council acknowledges that Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. This approach has not changed through the recent Ministerial Statement (4 October 2014) or the recent wording changes to the Planning Practice Guidance (PPG) that accompanied this statement. The Green Belt has always been a constraint that we have taken into account when deciding how far we can meet the area's objectively assessed need.  It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy.  Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to " <i>significantly boost the housing supply</i> " (para. 47). In considering these points, Councils are expected to meet their " <i>objectively assessed needs</i> " for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.	No

	<p>The Council considers that the changes to the PPG are particularly aimed at the growing number of speculative housing development proposals submitted by developers through the decision-making process (planning application) rather than the plan-making process. The changes do not affect how we implement plans that are already adopted, such as our Core Strategy and associated proposals that it contains.</p> <p>Therefore, the Council considers that nothing has fundamentally changed in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council progresses the Site Allocations DPD.</p>	
<p>Site layout and design:</p> <ul style="list-style-type: none"> <li>- Height of buildings.</li> <li>- Green buffers – between site and Rannoch Walk should be continued along behind Laidon Square; and between Severmead and proposed housing.</li> <li>- Proposed grid/block layout will not enable open space to permeate the neighbourhood – dominated by roads.</li> <li>- Renewable energy – ability for homes to be suitable for roof-mounted solar panels and inclusion of rainwater harvesting.</li> <li>- There should be a minimum of 15 metre buffer free from development either side of a hedgerow.</li> <li>- No indication of the number of car parking spaces required.</li> <li>- Proximity of properties to Marlborough Rise and Severmead in terms of privacy.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>Change required</b> – see response to <i>English Heritage (Historic England)</i> above.</li> <li>- <b>No change</b> – Aspects of detail, including those relating to green buffers, refining the site layout and identifying precise locations of open spaces, addressing concerns about building siting and impact on the privacy of existing (and new residents), will be further developed at the planning application stage and therefore too detailed for Policy LA1 and associated master plan to address at this stage. As such, the layout provided in Figure 9 of the master plan is only indicative at this stage of the planning process. Nevertheless, the proposed development will need to take account of and accord with the design policies of the Core Strategy, which cover a range of geographical scales from ‘Quality of Settlement Design (Policy CS10), to ‘Quality of Neighbourhood Design’ (Policy CS11) and ‘Quality of Site Design’ (Policy CS12). These policies require consideration to be given to key issues such as preserving and enhancing green gateways, protecting and enhancing wildlife corridors, as well as consideration of the scale, height and bulk of individual buildings, avoiding the loss of privacy, and inclusion of trees and shrub planting to help assimilate development and softly screen settlement edges.</li> </ul> <p>Additionally, as stated under the ‘<i>Change in proposed number of homes from 300 to 350</i>’ response, it is appropriate to make effective use of land if it is to be released from the Green Belt in order to minimise the scale of releases required. Following more detailed technical work carried out as part of preparing draft master plans, some site capacities have been adjusted to reflect the availability of further information about the amount of land available for development and/or the expected configuration of uses within a site, including areas dedicated for open space. Overall this does marginally increase the level of housing supply proposed across the Local Allocations, including LA1, as opposed to the levels indicated in the Core Strategy. The final capacity of all Local Allocations will be tested via the planning application process. This application process will include further public and stakeholder consultation.</p> <ul style="list-style-type: none"> <li>- <b>No change</b> – see response to <i>Grovehill Futures Neighbourhood Forum</i> in regard to the provision of renewable energy and sustainability and number of car parking spaces to be provided within the development.</li> </ul>	Yes
<p>Infrastructure capacity (general):</p> <ul style="list-style-type: none"> <li>- Schools and doctors surgeries already full</li> <li>- Heavily congested roads/capacity of network to accommodate LA1 (plus LA3).</li> </ul>	<p><b>No change.</b></p> <p><u>Infrastructure (generally):</u></p> <p>As part of preparing its plan for the scale and location of new development in the Borough, the Council has prepared an Infrastructure Delivery Plan (InDP). The InDP provides information on a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers. Information regarding doctors’ surgeries was provided by the Clinical Commissioning Group and information about school capacities has been provided by Hertfordshire County Council as Local Education Authority.</p> <p>The InDP is updated annually and work on the most recent update (June 2015) was scheduled to take account of representations received following consultation on the Pre-submission Site Allocations DPD and associated master plans in late 2014. This update addresses key infrastructure concerns raised by providers and, where appropriate, amendments will be made to the draft master plans where appropriate to ensure these are properly addressed. Specific issues raised relating to individual sites is addressed under the relevant Local Allocation. This revised version of the InDP will accompany the submission version of the Site Allocations DPD.</p>	No



Highway Infrastructure Capacity:

Both the local highway authority (Hertfordshire County Council) and the Highways Agency (who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPD. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by either party, although it is acknowledged by the Council that some local highways improvements and mitigation measures will be required relating to specific site proposals.

For Hemel Hempstead the consideration of highway issues has reflected outputs from the Hemel Hempstead Transport Model (Paramics model). This model is managed by specialist transport consultants on behalf of Hertfordshire County Council.

A number of model runs have been undertaken throughout the preparation of the Core Strategy and Site Allocations DPD to ensure that the most up-to-date information regarding the scale and location of new development within the town is reflected. These are as follows:

1. 2008 base model (May 2009).
2. 'Do minimum' models for 2021 and 2031- accompanied by a Future Years Issues Report (May 2009).
3. LDF Option Test Western Hemel (August 2010).
4. Combined Local Plan Test (July 2012).
5. Morrisons Development Test (Summer 2013).

In addition to the above a further model run was carried out in March 2015 to ensure that there had been no material change in circumstances since 2013 and help inform decisions regarding any changes that may need to be made to the Site Allocations DPD (and associated Local Allocation master plans) to take account of concerns raised through representations. The Highway Authority have advised that the 2015 model outputs indicate that there has been no material change in highway conditions since the Site Allocation Pre-Submission document was prepared and that there are no issues highlighted that cannot be ameliorated through appropriate mitigation.

In addition to transport modelling, specific traffic studies have been prepared for Local Allocation LA1. The latest transport assessment was published in November 2014:

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/la1-transport-strategy-141107-final.pdf?sfvrsn=0>

This has taken account of the Transport Model and agreed with the Highway Authority. Any necessary highway improvements are referred to in Policy LA1 in the Site Allocations document, and elaborated in the site master plan. The Highway Authority has confirmed through their representations that they support its content.

For LA1, detailed highway issues will be considered as part of the planning application process, for which the Highway Authority are statutory consultees. Appropriate highway improvements and mitigation measures will be secured through developer contributions and agreements. LA1 will need to ensure it achieves good pedestrian links to key facilities. These will be explored through a more detailed transport strategy as the proposal is advanced.

The proposed main vehicular access onto the A4147 Link Road opposite Howe Grove Wood is logical. It is the only viable location for the main vehicular access based on the information available and is supported by the Highway Authority. Its impact on Howe Grove Wood is expected to be minimal, as it will not require any land-take for this side of the road. Furthermore a roundabout or access point in this location will also have the benefit of reducing traffic speeds on the link road, which are currently high.

The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy. Although the precise wording has been amended in the light of recent announcements by Government regarding how flooding issues will be taken into account as part of the development process, the general approach remains sound (detailed in proposed change MC20 to the Site Allocations DPD). The SuDS feature shown on the concept plan to LA1 is indicative only. Surface water drainage will be considered in detail, including the implementation of appropriate SuDS measures where technically feasible, alongside the planning application for the new homes. Further advice will be taken from the Local Lead Flood Authority (LLFA) and Environment Agency (as appropriate) as part of pre-

	application discussions.	
Change in proposed number of homes from 300 to 350.	<p><b>No change.</b></p> <p>An estimate of site capacities for the Local Allocations was established through the Core Strategy. These estimates were based on prevailing densities and the area of the site, and tempered by local infrastructure considerations. It is appropriate to make effective use of land if it is to be released from the Green Belt in order to minimise the scale of releases required. Following more detailed technical work carried out as part of preparing draft master plans, some site capacities have been adjusted to reflect the availability of further information about the amount of land available for development and/or the expected configuration of uses within a site. Overall this does marginally increase the level of housing supply proposed across the Local Allocations as opposed to the levels indicated in the Core Strategy. It is important to note that this work has indicated that the capacity of one site (LA4) should be reduced. None of the issues raised through the Pre-Submission Site Allocations or draft master plan consultation indicate that the current capacity figures should be amended. The final capacity of all Local Allocations will be tested via the planning application process. This application process will include further public and stakeholder consultation.</p>	No
<p>Provision of Gypsy and Traveller site within LA1</p> <p>Suggestion for alternative location in the southern tip of the site adjacent to Link Road (proposed location of SuDS).</p>	<p><b>No change.</b></p> <p>While a traveller site at LA1 was not expressly referred to in the Core Strategy, the Council's approach has always been to accommodate new traveller sites as part of planned new, larger housing development. The background to this is set out in more detail in paras. 4.35-4.46 of the Providing Homes and Community Services (June 2015) background paper:  <a href="http://www.dacorum.gov.uk/docs/default-source/strategic-planning/issues-paper-providing-homes-community-services-sept-2014.pdf?sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/strategic-planning/issues-paper-providing-homes-community-services-sept-2014.pdf?sfvrsn=0</a></p> <p>As one of the larger housing sites, Local Allocations LA1 provides an opportunity for the specific accommodation needs of Gypsies and Travellers. This approach is reasonable given the lack of realistic alternatives available and in order to provide greater certainty over delivery and in meeting identified need. The location was previously identified through the Scott Wilson Report (2006) as an opportunity for a new site. In addition, the statement of common ground between the Council and LA1 landowners issued during the preparation of the Core Strategy in support of the proposal, made clear the potential for the development to accommodate a traveller site.(para. 3.6):</p> <p><i>"All parties acknowledge the Councils and HCAs position that the local allocation may need to accommodate a small number of pitches for travellers, in addition to housing. The area was identified as a potential location, together with others, in the Scott Wilson Report. The Council expects any decision to be taken in the light of an updated Gypsy and Traveller Accommodation Assessment and further consideration and examination through the Site Allocations DPD."</i></p> <p><i>Note: Legal advice is currently being sought on the implications of the Government's recent changes to the definition of Gypsies and Travellers in the Gypsy and Traveller Policy Statement. If any changes are required to the number or location of new pitches, this will be considered via the Report of Representation on the Pre-Submission Site Allocations Focused Changes. Any consequential changes needed to the master plans for consistency will be made via delegated authority.</i></p>	No
<p>Sustainable transport:</p> <ul style="list-style-type: none"> <li>- Most of LA1 would not be within 400 metres of a bus stop as required by the Local Highway Authority.</li> <li>- Provision of a subsidised bus service/shuttle service to Henry Wells Square for at least 2 years through developer's financial contributions.</li> </ul>	<p><b>No change.</b></p> <p>Paragraph 3.15 of the master plan recognises the requirement of the Local Highway Authority to provide a bus stop within 400 metres walking distance of new residential developments. Therefore, the need for a new bus stop in connection with LA1 is sufficiently identified at this stage of the planning process. Additionally, paragraph 7.6 of the master plan states that financial contributions will be sought from the developer for the provision of sustainable transport (as advised by Hertfordshire County Council's Passenger Transport Unit) through CIL. For clarification, financial contributions in respect of the junction arrangements required to access the proposed LA1 will be sought separately through a S106 agreement to directly fund those junction works.</p>	No
Loss of hedgerows and green barriers / wildlife corridors	<p><b>No change.</b></p> <p>Paragraph 3.9 of the master plan recognises the need to maintain wildlife/ecological corridors, including hedgerows, across the site to ensure connectivity with Howe Grove Wood Local Nature Reserve (LNR) as well as Margaret Lloyd Park and the wider surrounding countryside. Furthermore, the Landscape Principles within the master plan (paragraph 5.18) highlights the need for existing hedgerows to be retained where possible and states that a landscaping scheme will be drawn up for the proposal in support of a</p>	No

	<p>planning application. The condition of existing trees and hedgerows within the site will be further assessed through a Tree Survey/Arboricultural Report, therefore identifying their value within the landscape, which will be considered alongside the conclusions of any Phase 1 habitat survey and protected species surveys in terms of the ecological value of existing vegetation. This in turn should therefore inform the above-mentioned landscaping proposals to ensure that the development conserves and enhances the biodiversity of the area in accordance with paragraph 109 of the NPPF and Core Strategy Policy CS26. All of these matters will be considered at the planning application stage.</p>	
<p>No allotment within walking distance of the site – suggests use of other land owned by the HCA.</p>	<p><b>No change.</b></p> <p>Development of the LA1 site will be guided by the development principles set out in Policy LA1 of the Pre-submission Site Allocations DPD and associated master plan. This does not currently include an area of the site specifically allocated for use as an allotment but does include leisure space in the form of a Locally Equipped Area of Play (LEAP). This does not necessarily preclude the provision of an allotment within the site (subject to enabling the provision of 300-350 homes, road infrastructure, landscaping and necessary biodiversity enhancements, for example) but it is more likely that the developer will be required to make a financial contribution to the Council in the form of CIL. Consequently money could be allocated to spend on green infrastructure and open space provisions within the Borough where there is an identified need for new provisions or enhancements to existing provisions.</p> <p>The Council's Outdoor Recreation Officer has advised that there is an allotment site within Grovehill Playing Fields (located to the northeast of LA1 near Cupid Green Lane) which is considered to be within walking distance of the proposed LA1 Marchmont Farm site. Furthermore he advises that, other than those waiting for a specific plot, there is no waiting list for allotment space and as such evidently no demand to accommodate a new one within this locality.</p>	No
<p>Impact of development on visual amenity and landscape character.</p>	<p><b>Change required</b></p> <p>The site's topography has been taken into account when assessing the development potential of LA1, including completion of a detailed landscape assessment in 2004 (updated in June 2012) which takes account of the valley characteristics of the site (Area 8 Upper Gade Valley) and identifies the need to conserve and strengthen this character by integrating the development and retaining an appropriate landscape buffer between the site and Piccotts End. This assessment has subsequently informed the design principles contained within the master plan. This includes the need to limit buildings to two storeys in height except where a higher element would create interest and focal points. In line with proposed change MC17 to the Site Allocations DPD, additional clarification should be added to the 'Design Principles' contained within the Master Plan to ensure that any building higher than two storeys takes account of the local topography and the visual impacts. These design principles would be supported by the implementation of landscaping and planting to ensure the development provides appropriate visual buffers.</p> <p><i>See also response to English Heritage (Historic England) in regard to planted buffers.</i></p>	Yes
<p>Impact of development on Air quality.</p>	<p><b>No change.</b></p> <p>The site is not located within any designated Air Quality Management Area (AQMA) and the developer would not therefore ordinarily be required to submit an Air Quality Assessment report with any planning application. This is identified within the master plan through the absence of such a requirement under paragraph 6.4. However, this would be a matter for consideration at the validation stage following the initial submission of the planning application.</p>	No
<p>Impact of development on Ecological receptors/biodiversity (including during the construction phases).</p>	<p><b>Change required</b></p> <p>In preparation of the master plan and assessment of the development potential of LA1, appropriate surveys were carried out including those relating to ecological receptors (Phase 1 Habitat Survey by LDA Design dated July 2012). Whilst this identified that there would be no significant ecological impacts which cannot be mitigated by appropriate habitat and species management methods, such surveys are normally time-limited and the biodiversity and ecology of the site should normally be reassessed after 2-years from the date of any previous survey. Therefore, as per this best practice approach to development and consideration of biodiversity, it is inevitable that the developer will be required to produce a new Phase1 habitat survey, which will identify the characteristics, presence of species and other ecological receptors within and in close proximity to the site, and any subsequent species-specific surveys following on from the recommendations of the Phase 1 report.</p> <p>In accordance with the NPPF, when determining planning applications, local planning authorities should aim to conserve and enhance</p>	Yes

	<p>biodiversity by applying certain principles (paragraph 118). In particular, if significant harm resulting from a development cannot be avoided, adequately mitigated, or (as a last resort) compensated for then planning permission should be refused; and opportunities to incorporate biodiversity in and around developments should be encouraged (which includes taking account of Howe Grove Wood Local Nature Reserve).</p> <p>Therefore, development can only proceed where there are no significantly detrimental impacts upon biodiversity which cannot be appropriately mitigated or compensated for and where there are demonstrable biodiversity enhancements as a result of the development. As such, it will be for the developer to demonstrate this at the planning application stage using the above-mentioned surveying and reporting methods. There is an expectation that this would also include appropriate protection measures during the construction phases of the development.</p>	
Impact of development on archaeology.	<p><b>No change.</b></p> <p>Archaeological studies and assessments, including a Desk Based Archaeological Assessment for LA1 (2004), Trial Trench Report (2013) and Geophysical Survey Report (2013) for the wider Dacorum area, were completed in preparation of the Pre-submission Site Allocations DPD and associated master plan to identify the presence of any significant archaeological features which might constrain development of the LA1 site. These documents can be viewed on the website at: <a href="http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/localallocations/la1-marchmont-farm-hemel-hempstead">http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/localallocations/la1-marchmont-farm-hemel-hempstead</a>. Within these assessments it was concluded that the likely impact of the development upon any buried heritage assets was considered to be moderate to high and therefore, on that basis, the master plan requires the developer to complete and submit a further detailed Archaeological Assessment with any planning application. Such an assessment will identify how the proposed development might impact upon potential archaeological assets and what mitigation measures should be implemented to ensure that any such heritage assets are not damaged and/or preserved as a result of the development (depending upon their significance).</p>	No
Impact of development in terms of additional surface water-run off and flooding potential at Piccotts End.	<p><b>No change.</b></p> <p><i>See response to Environment Agency above.</i></p>	No
Impact of development from additional lighting, including the impact on Margaret Lloyd Park and ecologically sensitive receptors/species.	<p><b>No change.</b></p> <p>The impact of lighting from the development site on the tranquillity of Margaret Lloyd Park and ecologically sensitive receptors (e.g. bats) is a matter too detailed for either the Policy LA1 or the master plan to deal with at this early stage. This is a matter which would be dealt with at the planning application stage through the preparation and submission of appropriate assessments, including those listed under paragraph 6.4 of the master plan (i.e. the Protected Species Survey and Assessment, and Lighting Assessment).</p>	No
Impact of development on the setting of Piccotts End Conservation Area.	<p><b>No change.</b></p> <p><i>See response to English Heritage (Historic England) above.</i></p>	No
Loss/replacement of open space for recreational purposes.	<p><b>No change.</b></p> <p>Whilst a proportion of the area of greenfield land between Piccotts End and Grovehill would be lost through the development of LA1, the development would result in the extension of Margaret Lloyd Park, which itself is designated as Open Land, inclusion of open space throughout the development site as a result of the block and housing layout, and construction of a Local Equipped Area for Play (LEAP) within the extended Margaret Lloyd Park which seeks to cater for children aged 4 to 8 years of age. The proposal would not actually result in the loss of any designated Open Land. A right of way in the northern section of the site would require diversion in order to maintain existing pedestrian links between the site and the adjacent Lomond Road and nearby rights of way network. However, this is a matter which should be dealt with under the Highways Act 1980 (as amended) either prior to or after the planning application stage.</p>	No
Highway configuration (including street lighting along Piccotts End Lane) and access to the site from Link Road (roundabout as opposed	<p><b>No change.</b></p>	No

to priority junction).	<i>See response under 'Infrastructure capacity (general)'.</i>	
Monitoring congestion during construction and post-completion.	<p><b>No change.</b></p> <p>Any planning application submitted to the Council will need to be accompanied by a Transport Assessment which will incorporate details of the proposal, transport modelling to ensure that the proposed development can be accommodated within the capacity of the existing highway network and information to identify highway improvement works where needed to ensure the additional traffic can be accommodated in the local highway network. The Link Road is an already adopted public highway and is therefore maintained by Hertfordshire County Council as the Local Highway Authority. It would therefore be the County Council's responsibility to monitor this part of Dacorum's highway network.</p> <p><i>See also earlier response regarding infrastructure and highway network capacity.</i></p>	No
Housing/tenure mix – affordable housing to rent as opposed to market purchases.	<p><b>No change.</b></p> <p>The proposal set out in the Pre-submission Site Allocations DPD and master plan for LA1 reflects policies CS18 and CS19 of the adopted Core Strategy which requires the provision of 35% of affordable homes within a new development. It also states that a higher proportion of affordable homes may be sought on sites specified by the Council within a development plan document – this is what the Site Allocations and associated master plan seek to achieve and have requested the provision of 40% affordable homes within the new development at LA1, which has been agreed by the landowners and developer. Furthermore, the abovementioned policies require that 75% of these affordable housing units should be available for renting. The provision of affordable homes and consideration of any forthcoming planning application will also need to take account of the Council's Affordable Housing Supplementary Planning Document (SPD) (September 2013).</p> <p>Therefore, as set out within the master plan, the provision of affordable housing (and the composition thereof) will be in accordance with Core Strategy policies CS18 and CS19, the Council's Affordable Housing SPD. These requirements are summarised within the Homes Principles of the draft master plan document, which will be amended to reflect proposed change MC16 to the Site Allocations DPD (<i>See change noted above regarding building heights in response to English Heritage (Historic England)</i>).</p>	No
Adequacy of current consultation on Pre-submission Site Allocations DPD and associated master plan documents.	<p><b>No change.</b></p> <p>The recent consultation related to the Pre-Submission stage of the Site Allocations DPD (also referred to as the 'Submission' stage). The consultation requirements for this stage are set out in the Statement of Community Involvement. The Statement of Community Involvement is the Council's statement of policy on public consultation for planning policy documents (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has gone beyond the requirements of this SCI, and of consultation requirements set out within Government planning regulation, in seeking feedback on the Pre-Submission Site Allocations document (and associated draft master plans).</p> <p>In addition to the consultation mechanisms listed within the SCI (letters to those on our consultation database, press notices, website etc.), a series of public exhibitions were also held to provide an opportunity for residents to ask Officers' and Members' questions about the documents and the sites and proposals they contain. These exhibitions were held mid-way through the 6 week consultation period (which began on 24 September and ended on 5 November 2014). These consultation arrangements were agreed by Cabinet Members in June 2014 and ratified by Full Council in July 2014.</p>	No
<i>Individuals who agreed made the following comments:</i>		
None	N/A	N/A
<b>Landowners</b>		
<i>Landowners who disagreed made the following comments:</i>		
None	N/A	N/A

<i>Landowners who agreed made the following comments:</i>		
None	N/A	N/A

ISSUE: Master Plan: Local Allocation LA2		
<b>Number of people/organisations responding 9</b>		
<b>Supporting -</b>		
Key organisations	3	
Individuals	1	
Landowners	0	
<b>Total</b>	<b>4</b>	
<b>Objecting -</b>		
Key organisations	3	
Individuals	4	
Landowners	0	
<b>Total</b>	<b>7</b>	
<b>N.B Some of the organisations put forward comments both of support and objection, so they are included in the tally once for each support and object</b>		
<b>NOTE. A number of local residents wishing to raise concerns regarding the LA2 draft master plan did so by responding to the consultation on the Pre-Submission Site Allocations DPD, which ran in parallel to that for the master plans. Please refer to separate Report of Representations for a summary of issues raised and the Council's response.</b>		
<b>NOTE: Paragraph numbers referred to in the responses below relate to those of the September 2014 version of the master plan for LA2.</b>		
Issue	Response	Amendment required – yes or no
<b>Organisations</b>		
<i>Organisations who disagreed made the following comments:</i>		
<i>Environment Agency:</i>		
<b>Question 1: Section 2 'Context' and Section 3 'Analysis of the site'</b>		
3.4: Location of part of site in a Source Protection Zone 3 (SPZ3). Groundwater is part of Mid-Chilterns groundwater body which is currently classified as 'poor' status in the Thames River Basin Management Plan. Development proposals must therefore protect against further groundwater contamination – in accordance with Policy CS31 re Groundwater Source Protection Zones.	<b>No change</b> – The Council notes the groundwater sensitivities in this area and has already highlighted the need for the developer to complete a Land Contamination Assessment Phase 1 Report to be submitted with any forthcoming planning application (see section 3.8).. Within this assessment it is hoped that the impact of the proposed development on groundwater will be assessed and any necessary mitigation measures identified for inclusion within the development design, including any infiltration systems with treatment if necessary.	No
3.4: Potential surface water flooding issues just off the site to the west of the development area. This needs to be addressed as part of any development proposal, to ensure that a general greenfield run-off rate is maintained, in accordance with Policy CS31.	<b>Change required</b> – As a result of the background work for the Pre-submission Site Allocations DPD and Master Plan for LA2, the issue of flooding has been assessed through the Strategic Flood Risk Assessment Stage 1 (2007) and subsequently a Stage 2 SFRA (completed in 2008). Whilst the site is not located within any flood risk zone from fluvial sources, as stated within the draft master plan, the Environment Agency's flood risk maps identify that Fletcher Way immediately to the west of the site is at medium to high risk of surface water flooding. Therefore, a change is required to section 3.4 of the masterplan to clarify the risk of flooding from all sources and to ensure that the development is designed accordingly to minimise any flood risks to existing and new residents, and to highways. Also, sections 3.4 and 3.8 should require any planning application to be accompanied by a site-specific flood risk assessment which will re-assess flood risk from all sources and identify appropriate mitigation/design requirements.	Yes

3.4: The need to ensure Thames Water have sufficient foul drainage and treatment capacity for the site, in accordance with Policy CS29.	<b>Change required</b> – Minor change required in section 3.4 to reflect requirement for early liaison with Thames Water and to develop a Drainage Strategy to identify any infrastructure upgrades necessary to ensure sufficient sewerage and sewerage treatment capacity to support timely delivery of the development. This change will reflect MC22 to the Site Allocations DPD (ref policy LA2).	Yes
2.1: The need to incorporate water efficiency measures into housing design, in accordance with Policy CS29 to reflect Hertfordshire being an area of extreme water stress.	<b>No change</b> – The developer will be required to demonstrate compliance with Core Strategy Policy CS29 (specifically part (b) in regard to the consumption of water resources during construction and part (e) to limit residential water consumption to 105 litres per person per day) and in doing so they will be expected to submit a Sustainability Statement and carbon compliance checklist in support of any planning application for the development of LA2 (paragraph 18.22 of the Core Strategy). This will be assessed at the planning application stage and the Environment Agency will be consulted during that process. Additionally, details regarding the implementation of home-specific water efficiency measures will be the subject of regulations outside of the town and country planning remit. Specifically, following withdrawal of the Code for Sustainable Homes, the developer will be required to demonstrate compliance with the Building Regulations 1984 (as amended) which now includes a need to ensure the provisions for renewable energy, water efficiency measures and off-site carbon abatement measures for developments of 10 units or more (as inserted following enactment of the Infrastructure Act 2015).	No
<b>Question 2: Section 4 ‘Development Constraints and Opportunities’</b>		
3.4: The need to allocate appropriate space for surface water management across the site (such as Green Infrastructure for flood storage), across the site and the need to take site topography into account when designing this, in accordance with Policy CS31.	<b>No change</b> – The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy (Policy LA2 of the Pre-submission Site Allocations DPD). Section 3.4 of the masterplan refers to flood risk and drainage, which states that pre-application discussion on the drainage strategy and SuDS design is recommended; it also states that the topography of the site is an important consideration in relation to surface water management. Surface water drainage will be considered in detail, including the implementation of appropriate SuDS measures where technically feasible, alongside the planning application for the new homes. This will be a validation requirement at the planning application stage. Further advice will be taken from the Local Lead Flood Authority (LLFA), as well as the Environment Agency, as part of pre-application discussions.	No
3.4: The need to carefully consider infiltration drainage techniques in the light of site’s location in SPZ3 i.e. ensure suitable series of treatment steps to prevent pollution of groundwater.	<b>No change</b> – see comment above regarding SPZ3.	No
3.4: The need for water capacity issues to be discussed with Thames Water in terms of any necessary upgrades to waste water infrastructure as a result of this development.	<b>Change required</b> – Minor change required to reflect requirement for early liaison with Thames Water and to develop a Drainage Strategy to identify any infrastructure upgrades necessary to ensure sufficient sewerage and sewerage treatment capacity to support timely delivery of the development. This change will reflect MC22 to the Site Allocations DPD (ref policy LA2).	Yes
<b>Question 4: Section 6 ‘Masterplan’</b>		
Omission of any sustainable drainage features on the site.	<b>No change</b> – The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy (Policy LA2 of the Pre-submission Site Allocations DPD). Section 3.4 of the masterplan refers to flood risk and drainage, which states that pre-application discussion on the drainage strategy and SuDS design is recommended; it also states that the topography of the site is an important consideration in relation to surface water management. Surface water drainage will be considered in detail, including the implementation of appropriate SuDS measures where technically feasible, alongside the planning application for the new homes. This will be a validation requirement at the planning application stage. Further advice will be taken from the Local Lead Flood Authority (LLFA), as well as the Environment Agency, as part of pre-application discussions.	No
<i>English Heritage</i>		
<b>Question 4: Section 6 ‘Masterplan’</b>		
Potential for development to adversely affect character and appearance of the Conservation Area. Whilst requirements of draft policy and master plan will go some way to ameliorate this through: <ul style="list-style-type: none"> <li>Retention of existing trees on site;</li> <li>Retention of some open space at south of site where the development adjoins the Conservation Area; and</li> <li>Retention of view of church spire from Fletcher Way when approaching junction with Piccotts End Road via open land.</li> </ul>	<b>Change required</b> – The Council acknowledges the sensitivities of the location of the development with regard to its proximity to the Conservation Area, and the masterplan has been developed with input from the Conservation and Design Team. Support is noted to the points raised. A change will be made to the text on ‘visual impact’ on pages 13 and 14 to refer to the need to retain the view of the church spire from the top of the site.	Yes



<p>Master plan identifies the site for 2 storey dwellings, but steepness of slope may warrant adoption of more complex split-level forms in some areas. Clarification should be provided on:</p> <ul style="list-style-type: none"> <li>• Overall height to ridge and eaves when measured from lowest adjacent ground level;</li> <li>• Amending Figure 5.4 to remove reference to any taller elements on the site and instead refer to use of variations in architectural treatment of elevations to provide interest. The one point where a modest additional height may be appropriate is at the apex of the triangle that comprises the southern section of the development.</li> </ul>	<p><b>Change required</b> – In response to the issues raised the masterplan will be changed as follows: The text on ‘residential character across the site’ (page 25) will be amended to:</p> <ul style="list-style-type: none"> <li>• refer to the possibility of split-level homes;</li> <li>• provide guidance on maximum eaves and ridge heights;</li> <li>• state that taller buildings would need to demonstrate that no harm would be caused to the setting of designated heritage assets in the Old Town;</li> <li>• change upper height limit from 3 to 2.5 storeys.</li> </ul>	
<p><i>Sport England</i></p>		
<p><b>Question 5: Section 7 ‘Delivery’</b></p>		
<p>7.6: Lack of reference in paragraph 7.6 to provision of community sports facilities from either CIL or S106. This is required by Policy CS23 of the Core Strategy and policy 73 of the NPPF. Technical work prepared by the Council identifies the needs for indoor and outdoor facilities in the town. Such contributions should logically be in the form of financial contributions rather than on-site provision.</p>	<p><b>Change required</b> – The proposal does not seek to provide indoor or outdoor sports facilities on the site. As identified, the Council have recently completed an Outdoor Leisure Facilities Playing Pitch Strategy and Action Plan following completion of an assessment report in September 2014. This document will provide a platform for the Council as a whole to direct investment for social and community infrastructure improvements/provisions and to also inform the New Local Plan which could identify the provision of new facilities where they are evidently required. However, the current wording of the Council’s Regulation 123 list does not allow S106 Agreements to be entered into for the provision of indoor sports and leisure facilities or for outdoor sports pitches, as these are types of infrastructure that might be funded through CIL. In view of this, and the fact that the funding regime is subject to change, the Council recognises the need to identify social and community facilities as infrastructure that may be funded as a result of the impact of the development within section 7 of the master plan. It is reasonable to consider whether there is scope to consider such funding in negotiating the S106 at the planning application stage. However, this would similarly be subject to delivering other priority infrastructure identified in the master plan and its impact on the viability of the scheme. Any S106 agreement would need to comply with the Council’s Regulation 123 list.</p> <p>A bullet point will be added to section 7 of the master plan is proposed to reflect the potential for the development to contribute to the provision of social and community facilities, which could include outdoor and/or indoor sports facilities.</p>	<p>Yes</p>
<p><i>Organisations who agreed made the following comments:</i></p>		
<p><i>Environment Agency</i></p>		
<p><b>Question 5: Section 7 ‘Delivery’</b></p>		
<p>Support early engagement of Thames Water and SUDs Approval Body.</p>	<p><b>No change</b> – support noted.</p>	
<p><b>Question 6: Other comments</b></p>		
<p>Support and note that:</p> <ul style="list-style-type: none"> <li>• Housing design should incorporate water efficiency measures with the aim to achieve equivalent to that specified in Code for Sustainable Homes (Design principles);</li> <li>• Satisfied that Council will establish capacity of existing utility and infrastructure networks and provide any extra capacity required. This is particularly necessary for foul drainage;</li> <li>• Pleased that land drainage design will be co-ordinated with design of streets and open spaces. Development should achieve greenfield run-off rates and consider ponds, swales and permeable paving. To support reduction of flood risk, and water quality and biodiversity benefits. (Utilities and Infrastructure Principles).</li> <li>• Satisfied with the commitment to provide at least 1 hectare of open space, but its location needs further consideration, as this</li> </ul>	<p><b>No change</b> – support noted, individual comments responded to below:</p> <ul style="list-style-type: none"> <li>• See response to similar comments made by Environment Agency regarding Q1.</li> <li>• Noted</li> <li>• See response to similar comments made by Environment Agency regarding Q2.</li> <li>• The proposed location of the open space (adjacent to The Bounce and Townsend) has been carefully considered, and</li> </ul>	



<p>should be located in part on lower ground to enable incorporation of SUDs.(Landscape and Open Space Principles)</p> <ul style="list-style-type: none"> <li>Importance of retaining some informal spaces to replicate habitats, such as wild buffer zones around SUDs features. These areas should be managed to ensure their ecological value is maximised. (Landscape and Open Space Principles)</li> </ul>	<p>respects both important existing trees and views of St Mary's church spire.</p> <ul style="list-style-type: none"> <li>Section 3.2 Ecology and trees, sets out how the informal open spaces can be planned and/or managed to maximise ecological benefit as appropriate at planning application stage.</li> </ul>	
<i>HCC – Ecology Officer</i>		
<b>Question 1: Section 2 ‘Context’ and Section 3 ‘Analysis of the site’</b>		
<p>Support principles, but notes that:</p> <ul style="list-style-type: none"> <li>The role of the land in providing an ecological buffer / transition to the development area could be better recognised; and</li> <li>A basic Phase 1 Habitat Survey should be undertaken before any development begins, to inform any future management of the site. This should be referred to in paragraph 3.8: Planning application requirements.</li> </ul>	<b>Change required</b> – The masterplan will be amended to reflect the role of the land in providing an ecological buffer in section 3.2 (ecology and trees), with reference made to the conclusions of the Hertfordshire Ecological Networks report on the site. Also, sections 3.2 and 3.8 (planning application requirements) will be amended to refer to the need for a Phase 1 Habitat Survey at the planning application stage.	
<b>Question 2: Section 4 ‘Development Constraints and Opportunities’</b>		
<p>Particular support for:</p> <ul style="list-style-type: none"> <li>Recognition of value of open space and its contribution to local character;</li> <li>Opportunities for pocket park nature reserve or similar approach to open space; and</li> <li>Retention of trees where possible.</li> </ul>	<b>No change</b> – support noted.	
<b>Question 4: Section 6 ‘Masterplan’</b>		
Retention of open space and trees is sufficient to in area to contribute meaningfully to ecology, together with boundary trees and shrubs.	<b>No change</b> – support noted.	
<b>Question 6: Other comments</b>		
Notes important relationship between development site and open space to north alongside Piccotts End Road and importance of local entrance to Old Town area.	<b>No change</b> – support noted.	
<i>HCC Highways</i>		
<b>Question 6: Other comments</b>		
Note ongoing involvement with production of masterplan and supports the proposals for supporting infrastructure therein.	<b>No change</b> – support noted.	
<b>Individuals</b>		
<i>Individuals who disagreed made the following comments:</i>		
<b>Question 1: Section 2 ‘Context’ and Section 3 ‘Analysis of the site’</b>		
<p>Insufficient information provided on issues such as:</p> <ul style="list-style-type: none"> <li>Detailed design and how this will match that of the Old Town;</li> <li>The number of trees that will shield existing properties from the development;</li> <li>Layout;</li> </ul>	<b>No change</b> – the level of detail provided in the masterplan is considered sufficient at this early stage. The Council accepts that these matters will need to be carefully considered as the scheme is progressed to the planning application stage.	

<ul style="list-style-type: none"> <li>Detailed measurements to allow residents to assess detailed impacts upon their homes.</li> </ul>		
The need to access the site in bad weather – as steep incline is dangerous for cars in snow and ice.	<b>No change</b> – The local Highway Authority has not raised any fundamental concerns regarding the site’s overall accessibility. The topography of the site is not so steep as to prevent the land being developed. However, the master plan recognises that this factor needs to be carefully addressed in terms of the layout, design and provision of access through the site - see sections 3.3, 3.5 and 5.1 (guidance on ‘working with the topography’).	
<b>Question 2: Section 4 ‘Development Constraints and Opportunities’</b>		
Dwelling mix is unclear: are the homes for professional people or social housing?	<b>No change</b> – The master plan (section 3.7) makes clear that the proposal will be for a mix of market and affordable homes. The affordable homes will be 40% of the total homes to be provided. The detailed location, size and types of properties will be considered as the scheme is progressed.	
Impact on Old Town which has been subject of recent improvement project.	<b>No change</b> – This point is noted. The master plan recognises the importance of the Old Town in the design and layout of LA2 (see section 5 of the master plan).	
<b>Question 3: Section 5 ‘Masterplan Requirements’</b>		
The need to ensure that the principles are delivered on the ground.	<b>No change</b> – The role of the master plan is to ensure development principles are established and, together with related Policy LA2 in the Site Allocations DPD, to guide the form and character of future development on the site. Future schemes will have to have regard to this policy framework.	
Whether the site can really act as a ‘Gateway to the Old Town’ as the High Street is now one-way and the Old Town cannot be approached via Fletcher Way	<b>No change</b> – While the High Street is affected by the new one way system, this does not undermine the general principle of the site being a gateway location between the New Town and Old Town. The site will form an important transition into the Old Town and this is recognised in section 5.1 of the masterplan – see guidance on residential character across the site.	
Concerns regarding traffic speeds, steepness of footpaths and noise from using these paths when returning from pubs in the Old Town.	<b>No change</b> – The site is sufficiently safe and convenient to access on foot from the Old Town. The local Highway Authority has not raised any fundamental concerns over its overall accessibility. Sections 3.3, 3.5 and 5.1 (see guidance on ‘working with the topography’) recognise that the problems caused by the steep slope can be addressed through good design.	
Concerns scheme is out of keeping with the idea of promoting the Old Town High Street.	<b>No change</b> – Section 5.1 of the master plan notes the importance of respecting the character of the Old Town. It is likely that the new residents of the development will add to the vibrancy of the High Street and support local businesses.	
<b>Question 4: Section 6 ‘Masterplan’</b>		
Concerns that a building which appears to be a block of flats is adjacent to the individual’s property, and is not in keeping with the existing housing development and road layout.	<b>No change</b> – The proposal is at an early and high level stage, but the Illustrative Layout shows a green open space buffer between all the existing and proposed new housing. The layout plans are indicative only at this stage and will be subject to pre-application advice prior to submission of a planning application. The master plan seeks to steer the overall form of the development. More detail will emerge as the scheme is progressed, where the design of individual buildings will be considered in detail.	
The need for further detail regarding the final appearance of the buildings.	<b>No change</b> – The proposal is at an early and high level stage. The level of detail provided is considered reasonable for the current stage reached. The master plan seeks to steer the overall form of the development. More detail will emerge as the scheme is progressed	
<b>Question 5: Section 7 ‘Delivery’</b>		
-		
<b>Question 6: Other comments</b>		
<p>Object to the principle of development for the following reasons:</p> <ul style="list-style-type: none"> <li>Proposal is in direct conflict with national policies to protect Green Belt land and lack of any evidence of ‘very special circumstances’ to justify release;</li> <li>Impact on landscape, character and setting of historic Old Town;</li> <li>The field’s use by the local community for outdoor recreation;</li> <li>Exacerbation of traffic congestion in the Old Town and surrounding routes.</li> </ul>	<p><b>No change</b> - The strategic context for the local allocations is provided by the Core Strategy and the Site Allocations DPD must have regards to this. The level of housing and need for the local allocations was tested through examination of the Core Strategy by an independent Planning Inspector. In finding the Core Strategy sound, the Inspector accepted the Council’s approach to housing and the principle of the development of the local allocations. Therefore, the principle of releasing land from the Green Belt through the local allocations has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p> <p>This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council). These decisions clarify a number of key points, including:</p> <ul style="list-style-type: none"> <li>A ‘Local Plan’ can comprise a series of DPDs. Dacorum’s Site Allocations DPD is in-effect a ‘daughter document’ to the Core</li> </ul>	

	<p>Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out;</p> <ul style="list-style-type: none"> <li>• Councils should continue with the preparation of Site Allocations DPDs even where they do not deliver the full OAN figure for the area.</li> <li>• The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered: not to reassess what these targets should be.</li> <li>• That in Dacorum's case, housing delivery is only expected to fall short of delivering full OAN in the latter part of the plan period, by which time a new Local Plan (via the early partial review) will be in place and will have reconsidered appropriate targets.</li> </ul> <p>In the light of these decisions the approach taken by the Council to the Site Allocations DPD is considered to be both appropriate and legally compliant.</p>	
The need to make better use of brownfield land and empty homes in terms of meeting local housing needs.	<p><b>No change</b> - The Council is satisfied that the housing programme is robust and takes into account a full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, the Council has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to fully understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the roll of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA). This information will help inform the new single Local Plan process.</p>	
Local residents' views have been ignored in designating the site for development.	<p><b>No change</b> - A full summary of the consultation undertaken by the Council on both the Core Strategy and the current Site Allocations document are contained in the relevant Reports of Consultation and Report of Representations. All of these documents are published on the Council's website and their content has been reported to Members at the appropriate time. These documents explain how the Council has considered representations on the Local Allocations. The Council has had to balance many (and often competing) factors, including the views of local residents, in coming to a decision to release land from the Green Belt, including the LA2 site. The principle of this has been tested and accepted through the Core Strategy.</p>	
Whether there have been previous proposals to development of the site which have been abandoned due to steep incline.	<p><b>No change</b> – There have not been any previous proposals to develop the site. The topography of the site is not so steep as to prevent the land being developed. However, the master plan recognises that this factor needs to be carefully addressed in terms of the layout, design and provision of access through the site – see sections 3.3, 3.5 and 5.1 (guidance on 'working with the topography').</p>	
Concerns over heights of buildings: this should be restricted to a maximum of 3 storeys (Page 3)	<p><b>Change required</b> – Section 5.1 of the master plan will be changed to reflect that the acceptable maximum height for buildings will be 2.5, not 3, storeys. This change will also be reflected in the Development Principles and the Executive Summary.</p>	
The need to reflect the fact that if additional 'windfall' sites come forward, this will delay plans to build on the site (as promised in a letter from local councillors in September 2012).	<p><b>No change</b> – this is not the formal position of the Council, which is as stated in Core Strategy Policy CS3 and Site Allocations Policy LA2. These policies indicate that the site will be delivered from 2021. However, as the site is within Dacorum Borough Council's ownership, a decision to release the site for development will be made at the appropriate time.</p>	
Location of existing and proposed services (page 7): Incorrect reference to availability of a bank in the Old Town	<p><b>Change required</b> – Point accepted and the master plan will be amended to remove reference to banks in the High Street.</p>	
The presence of bats: the document says a bat survey will be carried out, but there are known to be bats present in trees along the eastern side of the field.	<p><b>No change</b> – The planning application requirements at section 3.8 of the masterplan include a protected species survey and assessment, which will include a bat survey. It is more appropriate to undertake a bat survey at application stage as it will be up to date at the time of the application. If bats are found to be present on the site, the survey will suggest appropriate mitigation measures.</p>	
The need to refer to and protect views: the document only refers to views across the valley from Gadebridge and not views from the north east of the field towards St Mary's Church, or from the High Street across the field.	<p><b>Change required</b> – Section 3.3, which deals with views and visual impact, will be amended to add a reference to the view of the church spire, which is recognised as a constraint in Figure 4.1. The development principles in section 5 and the Executive Summary will also be amended to recognise the need to safeguard views of the spire.</p>	

The protection that should be accorded to the field due to the 1972 designation as an 'Area of Great Landscape Value' under the 1947 Town and Country Act.	<b>No change</b> – Areas of Great Landscape Value were defined many years ago in broad terms in the Hertfordshire County Structure Plan and in detail in the Dacorum Local Plan. These areas were later called Landscape Conservation Areas. However, the County Council decided to drop Landscape Conservation Areas (and Landscape Development Areas) in favour of the Landscape Character Area approach, which covers the whole of the countryside not just parts of it. Policy CS25 in the Dacorum Core Strategy provides policy guidance on landscape character.  Consequently, the proposal site is not affected by any formal landscape designation as set out under the Proposals Map to the Dacorum Borough Local Plan and Core Strategy sufficient to prevent the allocation of LA2.	
<i>Individuals who agreed made the following comments:</i>		
<b>Question 3: Section 5 'Masterplan Requirements'</b>		
The development principles appear to meet the requirements for development of a sensitive area.	Support noted.	
<b>Landowners</b>		
<i>Landowners who disagreed made the following comments:</i>		
-	-	
<i>Landowners who agreed made the following comments:</i>		
-	-	

ISSUE: Master Plan: Local Allocation LA3		
<b>Number of people/organisations responding 88</b>		
<b>Supporting -</b>		
Key organisations	2	
Individuals	2	
Landowners	3	
<b>Total</b>	<b>7</b>	
<b>Objecting -</b>		
Key organisations	6	
Individuals	71	
Landowners	4	
<b>Total</b>	<b>81</b>	
<b>NOTE. Some local residents wishing to raise concerns regarding the LA3 development did so by responding to the consultation on Policy LA3 of the Pre-Submission Site Allocations document, which ran in parallel to that for the master plans. Please refer to separate Report of Representations for a summary of issues raised and the Council's response.</b>		
<b>NOTE: Paragraph numbers referred to in the responses below relate to those of the September 2014 version of the master plan for LA3.</b>		
Issue	Response	Amendment required – yes or no
<b>Organisations</b>		

Organisations who disagreed made the following comments:		
<p>Environment Agency:</p> <ul style="list-style-type: none"> <li>The site lies within a Source Protection Zone 3 (SPZ3). Any development proposal will need to ensure that further groundwater contamination does not occur as a result of this development.</li> <li>There are some surface water flooding issues through the north-east and southern parts of the site. Any development proposal should address these issues, ensuring that flood risk is not increased on or off site and that a Greenfield runoff rate is maintained.</li> <li>Pleased that you have considered the limitations of the foul water sewerage network and are engaging with Thames Water on the issue. We have concerns however with the potential temporary on-site packaged water treatment works to the south of the site.</li> <li>Water efficiency measures such as low/dual flush toilets, low flow/aerated taps and showerheads and efficient appliances should therefore be incorporated into the housing design.</li> <li>We are pleased that Shrubhill Common Local Nature Reserve has been recognised as a valuable piece of green infrastructure and that links will be maintained with the wider countryside.</li> <li>Space needs to be allocated for surface water management on site. There is great opportunity for a site of this size to have an exemplary, varied sustainable drainage scheme. Green roofs and green walls could be used throughout the site, as could ponds and swales.</li> <li>Owing to the site's location in SPZ3, any infiltration drainage techniques will need to be carefully considered. Where infiltration systems are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater.</li> <li>Pleased that upgrades to the sewer network have been identified, and that pollution to ground and surface water will be minimised.</li> <li>There is not a clearly labelled 'Indicative Layout' drawing as there is in the other Masterplan consultations.</li> <li>We are pleased that a number of balancing ponds have been indicated on the plan to address surface water issues.</li> </ul> <p>The following comments were made on the Planning Requirements:</p> <p><i>a) Green Infrastructure</i> – Pleased that green infrastructure (GI) links will be retained to Shrubhill Common, and that GI will be used for areas of surface water attenuation which will allow for additional water quality and biodiversity benefits to be realised.</p> <p><i>b) Open Space</i> – Content that the open space will be arranged to ensure a pleasant, coherent and wildlife-friendly network. It is important that some informal spaces are retained that replicate the surrounding habitats e.g. wild buffer zones along the main hedgerows and around the surface water drainage features. These areas can still be accessible to the public for amenity purposes and should be suitably managed to ensure their ecological value is maximised.</p> <p><i>f) Design Considerations</i> – Content with the commitment to design the</p>	<p><b>Change required.</b> It is helpful to note in the master plan that the site lies within a Source Protection Zone 3 (SPZ3) and the need to safeguard against any further groundwater contamination. We note the potential requirement for the developers to seek an Environment Permit from the Environment Agency should a water treatment works be needed. It is also reasonable for this to be reflected in the document and the necessity to consider the quantity and quality of effluent that would be discharged into the River Bulbourne with them.</p> <p><b>No change.</b> The Council recognises the need for early engagement between the developers and Thames Water on a number of matters including the foul water sewerage network and potential upgrades, ground and surface water pollution, and infiltration drainage techniques, etc. The master plan clearly states the importance of minimising ground and surface water pollution and providing natural solutions to achieve this (see paragraph 4.13). The need for water efficiency measures and maintaining run-off rates are already referred to in the master plan (resp. paragraphs 5.32 and 5.34). The use of green roofs and green walls, ponds and swales could be investigated as part of considering design and surface water measures.</p> <p>The indicative layout is high-level only given the nature and scale of the development, and reflects the level of detail available at the time of drawing up the master plan. The Council recognises that technical work is on-going, and that the level of detail will increase as the scheme is advanced.</p> <p>The Council welcomes the positive comments on the development principles. It will seek to ensure that the development achieves the highest standard of water efficiency applying at the time.</p> <p><b>Change required.</b> With regards drainage, the Council is aware through comments on the Pre-Application Site Allocations DPD that Thames Water is often requiring technical work to be carried out by developers of some larger schemes at the planning application stage. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. Therefore, it is considered appropriate to add a short reference to the planning requirements to Policy LA3 to refer to the need for liaison with Thames Water and the potential requirement for specific technical work to be carried out to assess capacity issues. This will allow flexibility at the pre-application stage should any more specific upgrade requirements be identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues.</p> <p>For consistency, this will require related amendments to the planning requirements for LA3 to ensure early liaison with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</p> <p>The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy. However, since publishing the Pre-Submission version of the Site Allocations document the Government has confirmed a change in approach to how development schemes will be assessed. Rather than a dual system when the local planning authority consider the planning application and the SuDS Approval Body (SAB), SuDS issues will now be dealt with through conditions on planning applications, following liaison between the LPA and SAB. The Council has prepared a short guidance note to explain how the new system will be operated. A minor change is required to the text of the 'Delivery and Phasing' section of the policy to ensure references are made to the correct advisory bodies. Similar amendments will also be required to the master plan and to encourage early liaison with these bodies.</p>	<p>Yes</p>

<p>development to the highest sustainability standards to include water efficiency measures. Housing designs should incorporate water efficiency measures with the aim to achieve 105 litres/head/day (l/h/d), equivalent to level 3 / 4 for water within the Code for Sustainable Homes.</p> <p><i>g) Surface Water Drainage</i> – Pleased that sustainable drainage systems will be incorporated into the development plans from an early stage ensuring that they are allocated the space they require.</p> <p><i>h) Services</i> - Content that you are working with Thames Water to ensure sufficient sewerage and sewage treatment capacity is provided. We have concerns however about the potential on-site water treatment works and the quantity and quality of effluent that would be discharged into the River Bulbourne. The Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. The River Bulbourne is currently classified as being of ‘moderate’ ecological potential, and is required to achieve ‘good’ ecological potential by 2027. This proposal could prevent the recovery of and/or cause further deterioration of the River Bulbourne. Connection to the main sewer network would be our preferred option for this site.</p> <p>If the water treatment works option is taken forward this would require an Environmental Permit from us. It may be difficult to demonstrate that this water treatment works would not have a detrimental impact on the River Bulbourne. If we are unable to grant an Environment Permit, the main sewer upgrades must be complete prior to occupation of the development.</p> <p><i>i) Green Belt and the Countryside</i> – Pleased that native species will be used planted around the development.</p>		
<p>Chilterns Conservation Board:</p> <ul style="list-style-type: none"> <li>Figure 1 and Plan 1 fail to clearly identify the Chilterns AONB and its boundary.</li> <li>The site is only about 1km from the AONB boundary. The Masterplan should clearly demonstrate that full account has been taken of the likely implications for the protected landscape.</li> </ul>	<p><b>No change.</b> Figure 1 and Plan 1 only seek to identify the broad location of LA3 rather than highlight key constraints and landscape designations. The Council accepts that the wider impact of the development is a key consideration in the setting, design, layout and landscaping of the proposal. The development principles in the master plan clearly set out the need to safeguard the wider views from the CAONB and the countryside.</p>	No
<p>Dacorum Environmental Forum:</p> <ul style="list-style-type: none"> <li>The development will not benefit any residents of Hemel Hempstead, and many will be adversely affected by it.</li> <li>There should be a presumption in favour of the highest level of sustainability in building standards. The LA3 development should be hailed a “Flagship Development” for energy conservation and environmental sustainability.</li> <li>Water management should consider the effect on Shrubhill Common.</li> <li>There should be an environmental impact study to demonstrate that the proposed “wildlife corridor” along the eastern side of the development adjoining Fields End will be fit for purpose.</li> <li>There is considerable local concern that sufficient provision for increase in traffic from the local access points has not been taken into account.</li> <li>Most of the residents of LA3 will need to commute to the Industrial Estate, the Motorways, or the Train Station, and no provision for this has been specified.</li> <li>The congestion is already acute in a number of locations and there</li> </ul>	<p><b>No change.</b> The principle of the development was consulted upon and tested at examination through the Core Strategy. It is now confirmed as a future housing location and release of Green Belt land. The role of the Site Allocations document (and the associated master plan) is to add detail to the proposal and to define the new Green Belt boundary.</p> <p>The majority of issues raised over the impact of the development are dealt with below in response to a variety of matters.</p> <p>The Council will seek to secure the highest sustainability standards applying at the time that any detailed scheme is submitted, but will have to weigh this against other considerations. Sustainability is much wider than environmental matters. There would be cost implications to achieving higher levels of sustainability, and that this needs to be balanced against viability and ultimately delivery of LA3. The Council keen that the proposal does perform as best as possible, given its importance to the town. Viability can be tested through the master planning process and later as development comes forward. Government policy could change over time and affect how code-levels are applied (e.g. through the Building Regulations).</p> <p>There is no absolute requirement for an environmental impact study to demonstrate that the proposed “wildlife corridor” along the eastern side of the development adjoining Fields End will be fit for purpose. However, the Council accepts the points over the need for careful management of the green spaces in order for them to be of ecological value. Plan 3 in the master plan does refer to the proposed extension of the Shrubhill Common.</p> <p>It is not necessary for the master plan to detail all sustainability measures to be incorporated into the development. The Council agrees that the development should promote the use of water efficient devices in the home and this is already acknowledged in the</p>	No



<p>does not seem to be any way to ameliorate this. Congestion at these points will also be increased with traffic from the other Local Allocations.</p> <ul style="list-style-type: none"> <li>• No specifications have been made for walking or cycling routes to the train station.</li> <li>• Chaulden Lane, Pouchen End Lane and the Winkwell Bridge are totally unsuitable for traffic that would need to access the proposed travellers' site.</li> <li>• Provision to restrict easy access to the rights of way (Chilterns Way and Hertfordshire Way) by fly tippers and unauthorised vehicles, has not been made.</li> <li>• The natural slope of the land is an excellent opportunity to include active solar PV in the design of the buildings, but this has not been specified in the master plan.</li> <li>• There is ambiguity as to whether the areas shown on the plan that appear to be Open Space are intended to be Green Infrastructure or Mown Grass, used for formal or informal recreation. Mown grass is totally unacceptable as a wild-life corridor.</li> <li>• The area allocated for Shrubhill Common Nature Reserve extension is not specified on the plan, and mown grass would not suffice.</li> <li>• The need for the children to commute to other parts of Hemel Hempstead has not been considered as the local secondary school (JFK) is oversubscribed, and has faith-related entry requirements. It would be left to Cavendish and Ashlyns Schools to give places to the children.</li> <li>• The consequence of increased demand for car parking at Parkwood Drive if services are improved there, has not been considered. The chronic parking problem in the Stoneycroft area has in the past threatened the integrity of Northridge Park as a valued open space.</li> <li>• All buildings should be built to the highest possible standards of energy sustainability and environmental sustainability, rather than the minimum standards in place at the time of building. This has not been emphasised in the Master plan.</li> <li>• There is a history of flash flooding towards the lower end of the valley and during periods of prolonged rain or heavy storms some overland flow may occur with temporary ponds forming on the saturated soils towards the valley bottom.</li> <li>• The construction of a new neighbourhood at LA3 will lead to a large increase in the amount of impermeable surfaces, thus reducing the natural movement of water towards and into the River Bulbourne.</li> <li>• There are water quality issues to be addressed to prevent pollutants and sediments from the developed area entering the river.</li> <li>• The reduction of water feeding into the valley could well have a detrimental impact on the ecosystem which is currently established in the Shrubhill Common Local Nature Reserve.</li> <li>• Additional water abstraction will mean that there will be further flow reductions in both the Bulbourne and Gade Rivers.</li> <li>• The development, should promote the use of water efficient devices in the home. Measures could include installing water butts in all gardens, the use of grey water by all households, creating new local water infiltration areas in conjunction with natural zones</li> </ul>	<p>master plan (see paragraph 5.35). Similarly, the role of active solar PV can be considered in the design of the buildings as part of achieving sustainable design and construction (see paragraph 5.32).</p> <p>The master plan recognises the need to maintain run-off rates at no more than the site presently generates in its greenfield state (see paragraph 5.34). Paragraph 5.34 also emphasises the need to consider surface water run-off impacts outside of the development area and this action can pick up on the effect of the proposal on water draining towards Shrubhill Common LNR.</p> <p>The status of the Shrubhill Common extension and its management can be discussed in more detail with the County Council's Ecology Officer as the proposal is advanced and its role within the scheme as a whole is better understood.</p> <p>See also responses below to related comments on the wildlife corridor and ecology (e.g. the County Council's Ecology Officer), and other matters.</p>	
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<p>to increase biodiversity and making good use of the existing drainage depression above Shrubhill Common.</p> <ul style="list-style-type: none"> <li>• Water should be passed through sediment and pollution traps before re-entering the River Bulbourne and treated locally, impermeable surfaces should be minimised and development, above Shrubhill Common should be restricted so as to maintain existing levels of groundwater flow into the common.</li> <li>• The planned provision of Sustainable Drainage Systems, SuDS, should be reinforced and supported by targets that run-off rates are no more than the site presently generates in its greenfield state, and by a commitment that there will be no significant reduction in water draining towards Shrubhill Common LNR.</li> <li>• Given the availability elsewhere of brownfield sites and less attractive Green Belt land, the proposals violate Government guidelines.</li> <li>• Shrubhill Common's planned Wildlife Corridor is inadequate as does not provide for the special needs for such a corridor and it cannot be simply mown grass. (Cross reference to advice on Wildlife Corridors from English Nature is made.). The ideal corridor would be the swathe of land between the two hedgerows to the west of HH20/Chiltern Way, currently designated as H1, H2, H7 on the draft Master Plan.</li> <li>• If a Shrubhill Common extension is proposed, it should have full Local Nature Reserve (LNR) status, with protection and management commitment equal to that of the existing Shrubhill Common LNR.</li> <li>• If the whole area currently designated H1 H2 H7 cannot be used as the Wildlife Corridor, a strip of land parallel with and immediately to the west of the existing HH20/Chiltern Way western hedgerow should be so designated. It should be no less than 15m wide.</li> </ul>		
<p>English Heritage:</p> <ul style="list-style-type: none"> <li>• Support the recommendation contained in the draft masterplan for further evaluation through trial trenching to be undertaken to inform the planning process. This should be undertaken in accordance with a scheme of works agreed with the County Archaeologist.</li> <li>• It will be necessary to give careful consideration to avoid the proposal adversely impacting on the Winkwell Conservation Area.</li> <li>• The landscape strategy will assist in mitigating the potential harm, but further details are required to ensure that those measures will be sufficient e.g. the width of the tree belt and a greater separation between the new housing and the Winkwell Conservation Area.</li> <li>• The developers should implement the full tree belt planting at an early stage in the development process, so that the planting can mature ahead of the construction of this final phase of housing.</li> </ul>	<p><b>Change required.</b> The Council recognises that it is important to minimise the impact of the development on the archaeological and heritage assets surrounding LA3. Many of these points are already covered in the master plan that accompanies the Site Allocations DPD. As Policy LA3 is proposed to be amended to include as a new development principle the need to safeguard these heritage assets, the master plan will need to be similarly updated.</p> <p><b>No change.</b> The Council accepts the need to safeguard the character and appearance of the Winkwell Conservation Area in making the above changes. However, it considers the structural tree belt would provide sufficient separation and screening between the development and the Conservation Area without the need for additional open space.</p> <p>The Council also accepts the important role the tree planting will have on limiting the impact of the development. However, the timing and width of the planting is too detailed a matter for either the policy or master plan to deal with at this early stage in the planning process. This can be pursued in progressing towards a planning application. Nevertheless, the master plan (paragraph 6.7) does recognise the need for advanced structural planting to enable a mature landscape to establish in advance of any development.</p>	Yes
<p>Sports England:</p> <p>Objection made to the development principles relating to open space and social/community uses covering:</p> <ul style="list-style-type: none"> <li>• Primary School Sports Pitches</li> <li>• Other On-Site Sports Facilities</li> </ul>	<p><b>Change required.</b> The Council recognises that Sports England have made a number of valid and detailed points. Given the scheme is still at a high-level stage it would be more sensible to discuss these points when the details of the proposal are more advanced. The master plan should thus be amended to require early liaison and co-ordination between the developers and Sports England over the provision of sports pitches and, where justified, other facilities.</p> <p><b>No change.</b> Community indoor sport facilities have not been specifically identified in the delivery section (Chapter 6) of the master plan as at this early stage it is not known exactly what facilities will be required and how they will be managed. The priority is to deliver outdoor facilities, but small-scale indoor facilities could be considered subject to delivering other priority infrastructure identified in the</p>	Yes



<ul style="list-style-type: none"> <li>• Off-site Outdoor Sports Provision</li> </ul> <p>Various detailed comments made on these points:</p> <ul style="list-style-type: none"> <li>• The principle of providing on-site sports facility provision is welcomed as this responds to identified need in the Council's evidence base (Outdoor Leisure Facilities Study (2014)).</li> <li>• However, concern is raised about the principle of primary school playing fields being proposed for meeting part of the additional outdoor sports facility needs generated by the community. Consequently the ability of the playing fields to meet a range of community pitch needs is usually limited in practice for a number of practical reasons e.g. capacity of pitches if the school has priority over its use, the need for ancillary facilities, the need for appropriate management arrangements, etc.</li> <li>• Sport England's preference would be for separate dedicated community playing field provision to be made for meeting the needs of residents and for the school's playing field to be made available as a secondary form of outdoor sports facility provision.</li> <li>• If the Council is minded to maintain this proposal in the master plan, Sports England request that the master plan principles make provision for a range of measures (as set out in their original comments) to reduce risk.</li> <li>• It should be noted that the site of the school playing fields will need to be graded so that they are broadly flat so that it is suitable for school or community use and the need for regrading could affect the proposed mini/junior pitches. This will need to be considered before the masterplan is finalised.</li> <li>• Consideration should be given to whether the primary school or other community facilities should be designed for other sports facilities at the master planning stage and if so, explicit reference should be made in the master plan as this will have implications for the planning and design of these facilities (and the costs).</li> <li>• Concerns are raised over the detailed approach of making off-site provision and this should be informed by the Council's Outdoor Leisure Facilities Study Action Plan. The master plan should identify specific off-site projects (not just football) that the development will fund. Sport England would prefer a section 106 agreement to be completed that would require a specific playing field project(s) to be implemented rather than a contribution being pooled with contributions from other developments.</li> </ul> <p>Objection has also been made to the delivery section as paragraph 6.10 does not include community indoor sports facilities as an item that would be funded:</p> <ul style="list-style-type: none"> <li>• The master plan implies that only outdoor sports facility provision (pitches) will be secured from the development as this is one of the largest new housing allocations proposed in Dacorum.</li> <li>• It should make appropriate provision in order to accord with the Core Strategy policies and paragraph 73 of the NPPF.</li> <li>• Sports England accepts that it may not be practical or viable to provide on-site indoor sports facility provision on a site of this size.</li> <li>• Contributions towards the provision or enhancement of off-site</li> </ul>	<p>master plan, its impact on the viability and delivery of the scheme as a whole, and the availability of other funding streams. Off-site facilities would be more difficult to fund. It should be noted that the development will provide for significant opportunities for play space. It will also need to fund a wide range of other key facilities and infrastructure.</p> <p>The Council have recently completed an Outdoor Leisure Facilities Playing Pitch Strategy and Action Plan following completion of an assessment report in September 2014. This document will provide a platform for the Council as a whole to direct investment for social and community infrastructure improvements/provisions and to also inform the New Local Plan which could identify the provision of new facilities where they are evidently required. The funding regime is often subject to change, but in theory the Community Infrastructure Levy (CIL) collected from other development sites in the Borough could contribute towards future off-site sport facilities. At present LA3 is zero CIL rated and developer contributions will be secured through an s.106 agreement. It is reasonable to consider whether there is scope to consider such funding in negotiating the s.106 at the planning application stage. However, this would similarly be subject to delivering other priority infrastructure identified in the master plan and its impact on the viability of the scheme. Any s.106 agreement would need to comply with the Council's Regulation 123 list that sets out which types of infrastructure may be funded through CIL, and hence not s.106.</p>	
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<p>facilities should be secured through a s106 agreement or CIL.</p> <ul style="list-style-type: none"> <li>Community sports facilities should be listed in paragraph 6.10 of the master plan to provide clarity and certainty of the importance of providing for this type of infrastructure provision.</li> </ul>		
<p>West Hemel Action Group (WHAG):</p> <ul style="list-style-type: none"> <li>The LA3 development is in conflict with the National Planning Policy Framework (NPPF). It is ill conceived in its entirety as well as being an unjustified and unsupported encroachment on the Green Belt.</li> <li>There has not been any explanation of the "exceptional circumstances" that justifies the LA3 development.</li> <li>There are certain utilities/services that the Council cannot deliver but there is little detail about ensuring that the necessary plans will be put in place to ensure that these are deliverable by them.</li> <li>No full assessment has yet been done to ensure that the site can be appropriately and adequately drained.</li> <li>There are not sufficient guarantees that there will be a bus service to support the intention of less car and more public journeys for the new development.</li> <li>The development will not benefit the existing residents of Hemel Hempstead as it will create more congestion, be a drain on existing facilities and resources, no real thought or plan on how to address these issues, and the enhancements proposed are inadequate for the size of development.</li> <li>There is no assessment or consideration as to whether Chaulden Lane can support additional traffic if it is to be used as an emergency access. It is very much a rural road, being single lane.</li> <li>There has been no assessment or consideration of the impact of LA3 on the wider transport network.</li> <li>There will be no significant infrastructure improvements to mitigate the level of traffic generated by the LA3 development.</li> <li>Is it sensible for the affordable housing to be spread throughout the whole estate?</li> <li>No local residents consider a Travellers site appropriate or desired as part of the LA3 development. The current planned location appears to be completely inappropriate given access and egress on Chaulden Lane is completely impractical and inappropriate, and its current planned location does not promote integration.</li> <li>The provision of one shop is insufficient. The current shops at Long Chaulden and Warners End are already busy and the car parking congested without the extra traffic that LA3 would generate. Travelling further to existing supermarkets will go against the intention of having more travel using public transport.</li> <li>Hemel Hempstead is now poorly served with the hospital move to Watford and would be worse off with the additional 2,500 or so extra residents but no extra facilities planned.</li> <li>There is no discussion / consideration around ensuring that there are enough school places for the children in the new primary school when they reach secondary education age.</li> <li>There is nothing to ensure that the design considerations are adhered to, and that they are not reduced under pressure from the developers due to cost/impact on their profit margins.</li> </ul>	<p><b>No change.</b> The points raised by WHAG are dealt with below under related headings.</p>	<p>No</p>

<ul style="list-style-type: none"> <li>• Surface water needs to be kept in this area to save the chalk streams. It should be treated locally before returning to the streams in this area, not at Maple Cross.</li> <li>• There is no reference to ensure that there is sufficient water supply for this significant number of new houses.</li> <li>• The plan indicates that it will take 7.5 – 9 years to build. This is an inappropriately long period of disruption to the whole existing neighbourhood.</li> <li>• The plan does not set out or define the processes to be put in place to ensure that all the elements of this document are delivered and are not watered down.</li> </ul>		
<i>Organisations who agreed made the following comments:</i>		
<p>Ecology Officer, Hertfordshire County Council:</p> <ul style="list-style-type: none"> <li>• The local ecological resources in themselves are of some local importance and particularly in their role in supporting the LNR and opportunities should be taken to maintain this ecological function.</li> <li>• The presence of Shrub Hill Common LNR should be stated within the Section on Ecology.</li> <li>• The role of Shrub Hill Common ecological corridors should be included within Section 4.13.</li> <li>• The most obvious location for an ecological corridor to Shrub Hill common is largely proposed for development – H1, H2 and H7.</li> <li>• Shrubhill Common needs to be managed primarily for ecology.</li> <li>• If the proposals are approved as outlined, a 15m width of open land should be left adjacent to the existing Green Lane; this would also need to be managed largely for ecology.</li> <li>• The intention to create a wildlife friendly network throughout the neighbourhood should also significantly influence the management of the Shrub Hill Common extension corridor.</li> <li>• Supports the recognition of softening the countryside edges of the development which will also provide local ecological benefits.</li> </ul>	<p><b>Change required.</b> General support noted and welcomed.</p> <p>It is reasonable to insert references in the master plan to the proximity of LA3 to Shrubhill Common LNR and the importance of the Shrubhill Common ecological corridors in delivering a sustainable development.</p> <p>The Council accepts the importance of LA3 in offsetting some of the loss of existing open habitats and maintaining a robust and functional link to Shrub Hill Common Local Nature Reserve. As a general approach the development will offer significant levels of open space. An alternative north-south green corridor would be disrupted by the extension of The Avenue as one of the two main access points into the development. The access is essential and there are no logical alternatives. Any substantial enlargement of the current proposed green corridor/tree belt could reduce the capacity of the scheme and potentially affect its viability and/or the delivery of key contributions. Furthermore, a reduced east-west corridor could have an impact on the strategic landscaping setting for the new development contrary to other objectives in the policy and master plan.</p> <p>Recent discussions have taken place with the County Council's Ecology advisor over the suitability, form, and role of the green corridors and other green infrastructure. The County Council acknowledge that both the north-south and east-west corridors have advantages and disadvantages as proposed extensions to Shrubhill Common. On balance, they are satisfied that an east-west corridor is appropriate subject to adopting a sound approach to its ecological value and management. The Council accepts that clarification over the different leisure and wildlife roles and ongoing management of the green infrastructure would be helpful to ensure the ecology to be provided is of genuine value. In addition, it recognises that any new development should maintain a sensitive relationship to the existing north-south green corridor. These points can be reflected in amendments to the master plan.</p>	Yes
<p>Local Highway Authority:</p> <p>The Highway authority has been closely involved in the drawing up of the master plans for these sites and supports the proposals for supporting infrastructure identified therein.</p>	<p><b>No change.</b> General support noted and welcomed.</p>	No
<b>Individuals</b>		
<i>Individuals who disagreed made the following comments:</i>		
<p><i>Principle of development:</i></p> <p>Objection raised to principle of development:</p> <ul style="list-style-type: none"> <li>• Reference to Ministerial Statement 4 Oct 2014 in relation to protecting Green Belt and prioritising brown field land for new housing development.</li> <li>• The development appears to be excessive with no proper argument being given to show that housing need (in this location) outweighs loss of Green Belt land.</li> </ul>	<p><b>No change.</b> The strategic context for the local allocations is provided by the Core Strategy and the Site Allocations DPD must have regards to this. The level of housing and need for the local allocations was tested through examination of the Core Strategy by an independent Planning Inspector. In finding the Core Strategy sound, the Inspector accepted the Council's approach to housing and the local allocations. Therefore, the principle of releasing land from the Green Belt through the local allocations has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p> <p>This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council). These decisions clarify a number of key points, including:</p>	No

<ul style="list-style-type: none"> <li>• Discussions should take place with St Albans DC to develop plans east of Hemel Hempstead which would be less intrusive to Green Belt land and benefit both councils.</li> <li>• Principle objection to building on Green Belt.</li> <li>• No exceptional circumstances are defined in the Core Strategy, draft Master Plan or site allocations. and no information has been supplied detailing, that in fact, all "brown field" sites have been exhausted.</li> <li>• There is enough land that can be built on in Hemel Hempstead, including sufficient brownfield sites <i>and unused office space</i>, without the need for building on Green Belt Land.</li> <li>• 900 Homes is far too much for this area of Hemel Hempstead to take.</li> <li>• The easy option of using land speculatively purchased in the past by developers is not an exceptional circumstance for release of the Green Belt.</li> <li>• Hemel Hempstead will end up amalgamating with Tring, Berkhamsted and Leighton Buzzard.</li> <li>• Local physical and social infrastructure cannot cope with the additional housing.</li> <li>• There is no quantitative need/evidence for this additional housing.</li> <li>• Objection to development – current value for farmland, wildlife, public footpaths</li> <li>• Once the countryside is lost it cannot be replaced.</li> <li>• No consideration given to extra traffic and that through roads will become a rat run, especially where The Avenue is currently a no through road. There is insufficient parking at the railway station, bus services withdrawn from going to the station, and commuting is on the rise because of large companies leaving Hemel.</li> <li>• No provision for housing for elderly people.</li> <li>• It is not thought that one shop will be sufficient for 900 homes, consideration needed on primary school provision and doctors surgery.</li> <li>• Concern regarding disruption from construction of the development.</li> <li>• Concern over house-building leading to settlements merging.</li> <li>• The town will soon consist purely of housing at the expense of other amenities. We have already lost most of the hospital, police station, large employers, and entertainment venue and instead flats, houses are built on any available space.</li> <li>• Concern regarding economic downturn, preventing housing from selling and increasing the number of rented properties.</li> <li>• The fact that none of the land is protected by landscape designations and the willingness of a landowner to bring land forward for development should not be justification for its removal from the Green Belt.</li> <li>• Integration with the rest of town would be very challenging due to distance that the development will be situated from services / and in the absence of public transport will result in a substantial increase in private vehicular traffic.</li> <li>• New housing nearer to primary routes (M1/A1 etc.) and existing facilities would be preferable.</li> <li>• The Context of LA3 should acknowledge that the development will</li> </ul>	<ul style="list-style-type: none"> <li>• A 'Local Plan' can comprise a series of DPDs. Dacorum's Site Allocations DPD is in-effect a 'daughter document' to the Core Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out;</li> <li>• Councils should continue with the preparation of Site Allocations DPDs even where they do not deliver the full OAN figure for the area.</li> <li>• The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered: not to reassess what these targets should be.</li> <li>• That in Dacorum's case, housing delivery is only expected to fall short of delivering full OAN in the latter part of the plan period, by which time a new Local Plan (via the early partial review) will be in place and will have reconsidered appropriate targets.</li> </ul> <p>In the light of these decisions the approach taken by the Council to the Site Allocations DPD is considered to be both appropriate and legally compliant.</p> <p>The Council is satisfied that the housing programme is robust and takes into account a full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, the Council has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to fully understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the roll of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA). This information will help inform the new single Local Plan process.</p> <p>The Council has been in discussions with St Albans DC over the joint planning of land adjoining the eastern side of Hemel Hempstead. This will need to be taken forward jointly in considering the respective housing growth in their emerging new local plans.</p> <p>The Council cannot guarantee that there will not be additional building on Green Belt land in the future. It needs to determine each time it rolls forward its housing programme what the level of future housing is and how it can accommodate this. The Council will have to balance its requirement to meet its future housing target against safeguarding the permanency of the Green Belt.</p> <p>Other points raised by individuals are dealt with below under related headings.</p>
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<p>not benefit any residents of Hemel Hempstead, and many will be adversely affected.</p> <ul style="list-style-type: none"> <li>• The development will only be of benefit to residents of Hemel Hempstead if it is built to the highest possible standards of sustainability, energy conservation, increased biodiversity and architectural excellence.</li> <li>• There is no guarantee that there will be no additional building on Green Belt.</li> </ul>		
<p><i>Community hub/community facilities/shops:</i></p> <ul style="list-style-type: none"> <li>• Whether more shops should be provided.</li> <li>• There needs to be more than one shop, otherwise it will be impossible to park at the shops at Warners End and Chaulden.</li> <li>• Employment for the new residents will be a considerable distance away.</li> <li>• The site itself will not provide enough services / facilities for the people living there.</li> <li>• One shop unit is not adequate (the Fields End estate has no shop either) for so many new residents.</li> <li>• Whether a single shop is sufficient to serve the development.</li> <li>• Chaulden and Warners End shops are already congested, and lack of any further provisions will encourage new residents to travel further (by car) to other foodstores.</li> <li>• A range of shops within the development are essential to limit unnecessary travel out of the new development.</li> <li>• More shops, chemist, Post Office, medical facilities, secondary school, are needed close at hand if the idea is to minimise the need to travel by transport.</li> <li>• Clarity required over the term "Shared use of facilities" (para. 4.11) and whether this includes doctors' surgery, hospital and secondary schools (and if so) how this will be achieved.</li> <li>• The plan should be clearer as to what the community provision will be e.g. church, community centre, retail services, chemists, launderette, takeaway facility, post office and bus services, etc.</li> <li>• There should be more facilities for the elderly or teenagers.</li> <li>• A cemetery is referred to but there is no mention of this within the document and where it would this would be sited.</li> </ul>	<p><b>No change.</b> The Council is seeking to encourage a multi-functional community hub that will provide for a range of small-scale services and facilities to serve the scheme and surrounding neighbourhood. The general aim is to provide flexible space within the community hub and Policy LA3 and the master plan allow for this.</p> <p>The actual mix of uses is not known at this early and high-level stage. This will be considered in more detail in progressing the development, and could include facilities for teenagers and the elderly depending on demand and funding. The level of shops and other commercial uses will be subject to viability which will limit the number and mix of uses the community hub can reasonably support. There are no definitive standard to apply. However, it is not intended that the centre would be of an equivalent scale as the nearby New Town neighbourhood local centres or that it would provide significant levels of local employment. There would be the normal expectation that residents would need to travel to access higher order facilities and other job opportunities.</p> <p>The proposal for a cemetery was identified as an option at the Core Strategy stage. However, this is now an intentional omission in Policy LA3 and the master plan. Discussions have now moved on since then, and it is no longer a preferred option. An alternative and preferred option is being explored at Bunkers Park through the Site Allocations DPD under proposal MU/5 as part of a mix of leisure and community uses there.</p>	No
<p><i>Schooling:</i></p> <ul style="list-style-type: none"> <li>• Whether the impact of LA3 on secondary schooling has been sufficiently considered.</li> <li>• Secondary school provision needs to be considered, whether building a new secondary school or expanding existing secondary schools.</li> <li>• Why build a new school when the Martindale School is not being used?</li> </ul>	<p><b>No change.</b> The County Council as Local Education Authority (LEA) is satisfied that secondary schools can accommodate potential pupil growth. However, the Council acknowledges the need for on-going liaison with the LEA over planning for future secondary school places in the town.</p> <p>The County Council consider that the Martindale School site and buildings are no longer suitable to meet their future educational needs. Therefore, it is not available as a new school site.</p> <p>The Council accepts that it is not always possible for a school to be available for use by the local community. However, it is reasonable for the feasibility of this to be explored and most schools take a positive attitude towards the sharing of its facilities.</p>	No
<p><i>Transport/Movement/Highways:</i></p> <ul style="list-style-type: none"> <li>• Whether real time local knowledge has been fully taken into account regarding the wider implications that the increase in traffic will bring.</li> <li>• No proper assessment or consideration has been carried out of the impact of LA3 on the wider transport network e.g. Fishery</li> </ul>	<p><b>No change.</b> The Council acknowledges the need to have an up to date understanding of the implications of new development on the strategic and local road network. It is important we have continuing liaison with the main transport agencies.</p> <p>Both the local highway authority (Hertfordshire County Council) and the Highways Agency (now called Highways England - who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by either party, although it is acknowledged by the Council that some local highways improvements and mitigation</p>	No

<p>Lane and Two Waters heading for the station and the A41 bypass.</p> <ul style="list-style-type: none"> <li>• The highways study was prepared for Taylor Wimpey and adopts the most optimistic capacity factors to minimise any calculated queuing. This is a clear conflict of interest.</li> <li>• The inadequacy of the road and footpath network around the site has not been properly addressed.</li> <li>• The proposal is poorly located to access the M1, employment opportunities and services / facilities.</li> <li>• Traffic implications of this one site must be placed in context with other developments happening in Hemel Hempstead.</li> <li>• Another access point is needed on the other side of the development (not specified).</li> <li>• A development of this scale should not be considered without building additional "link" roads for vehicles to reach the main roads such as A4251, A41 and A4146, without increasing the traffic load on existing residential roads.</li> <li>• Insufficient consideration has been given to the traffic impact on existing infrastructure, especially Chaulden Lane, Bosted Road, Galley Hill, Warners End Road and Northridge Way.</li> <li>• Agree that Pouchen End Lane should be restricted access to prevent it being used excessively.</li> <li>• Additional traffic using Chaulden Lane / Pouchen End Lane and other rural roads around the development will lead to an increase in accidents.</li> <li>• The suitability of Chaulden Lane/Winkwell to serve the traveller site.</li> <li>• The extra traffic on the town in general has been ignored. Roads in Hemel Hempstead, particularly around the station for example, are already congested.</li> <li>• Increases in traffic on existing local roads planned for should be strictly within limits set by the sustainability aims.</li> <li>• Road improvements should be limited so as not to encourage increase in speed of traffic flow.</li> <li>• Increases in car parking capacity at the station should be strictly minimised to discourage increased car use for journeys to the station.</li> <li>• No consideration given to the vast increase in traffic flows westwards though Potten End and rural roads which already suffer from very heavy traffic flows.</li> <li>• The need to minimise car travel needs to be reinforced.</li> <li>• The cycle and pedestrian routes should be developed.</li> <li>• Provision needs to be made for a footpath adjacent to Chaulden Lane, within the boundaries of the new development.</li> <li>• During the lengthy period envisaged for construction work to take place, construction traffic could not use Chaulden Lane nor could it use the estate roads such as Lindlings which are already clogged up with traffic.</li> <li>• The solution of using non-vehicular access is not workable unless there are plans to ban cars because people will continue to use their car.</li> <li>• Sceptical that that car avoidance schemes such as encouraging cycling, walking and using buses will be successful.</li> <li>• More thought must be given to the traffic flows including the use of</li> </ul>	<p>measures will be required relating to specific site proposals, such as LA3. The Council is not proposing growth in the Site Allocations document above the level set out in the Core Strategy. The evidence base reflects this position (see below). Improvements have already been identified in order to accommodate the growth. The technical transport work is on-going, particularly as we take forward work on the new Local Plan, and additional transport assessments will be required for the larger sites at the appropriate time.</p> <p>For Hemel Hempstead the consideration of highway issues has reflected outputs from the Hemel Hempstead Transport Model (Paramics model). This model is managed by specialist transport consultants on behalf of Hertfordshire County Council.</p> <p>A number of model runs have been undertaken throughout the preparation of the Core Strategy and Site Allocations DPDs to ensure that the most up-to-date information regarding the scale and location of new development within the town is reflected. These are as follows:</p> <ol style="list-style-type: none"> <li>6. 2008 base model (May 2009).</li> <li>7. 'Do minimum' models for 2021 and 2031- accompanied by a Future Years Issues Report (May 2009).</li> <li>8. LDF Option Test Western Hemel (August 2010).</li> <li>9. Combined Local Plan Test (July 2012).</li> <li>10. Morrisons Development Test (Summer 2013).</li> </ol> <p>In addition to the above a further model run was carried out in Spring 2015 to ensure that there had been no material change in circumstances since 2013 and to help inform decisions regarding any changes that may need to be made to the Site Allocations DPD (and associated Local Allocation master plans) to take account of concerns raised through representations. The Highway Authority have advised that the 2015 model outputs indicate that there has been no material change in highway conditions since the Site Allocation Pre-Submission document was prepared and that there are no issues highlighted that cannot be ameliorated through appropriate mitigation.</p> <p>In addition to transport modelling, specific traffic studies have been prepared for Local Allocations LA1 and LA3. These have taken account of the Transport Model and agreed with the Highway Authority. Any necessary highway improvements are referred to in the relevant Local Allocations policies of the Site Allocations document, and elaborated in the site master plans. The Highway Authority has confirmed through their representations that they support the content of all. Movement issues were considered in detail through technical work on LA3. The matter is sufficiently covered in Policy LA3 / master plan and the need for on and off-site improvements and other sustainable transport measures identified. Acknowledge the need for on-going technical work and liaison with the local Highway Authority (HCC Highways). The wider impact of the local allocations (and other housing development) in Hemel Hempstead on the road network has been considered through an updated transport model run (2014 model year) of the town (as referred to above). It has helped predict future demand and potential capacity issues on the network and the need for associated road improvements.</p> <p>The level of detail in the LA3 master plan is sufficient at this early stage to identify key transport and other improvements required by the new development. This makes clear what is needed at later stages to allow for appropriate highway improvements and mitigation measures to be secured through developer contributions and agreements. The master plan is supported by a range of technical work, including highway matters. The local highway authority (Hertfordshire County Council) has been consulted on the local allocations throughout preparation of the Core Strategy and Site Allocations DPDs and support the content of these documents. They have been satisfied over the ability in each case of the overall road network to cope with the scale of new development proposed and the nature and suitability of highway works necessary. Liaison with the County Council is on-going. More detail over the timing and type of works required will emerge as schemes are advanced.</p> <p>For further information regarding technical work please see the transport section of the Sustainable Development Strategy Background Issues Paper.</p> <p>Additional detailed transport work will accompany the planning application which will further assess the wider impact of the development on the road network. The County Council will advise as to the nature and extent of off-site junction improvements required on the local road network, which has already been identified as infrastructure the development should contribute towards. The Council and County Council acknowledge that there will be the need for careful management / enforcement of Chaulden Lane and surrounding rural roads in order to reduce rat running and to protect the rural character of Winkwell and this will be investigated as the proposal is progressed.</p> <p>We accept that there will continue to be a reliance on the car, especially for longer journeys. However, promoting non-car travel will</p>	
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<p>signalling at key junctions.</p> <ul style="list-style-type: none"> <li>• No specifications have been made for walking or cycling routes to the station.</li> <li>• Plans should be put in place to prevent Pouchen End Lane and Chaulden Lane being used as “rat runs” e.g. a no-through point for cars.</li> <li>• For safety of road users, proper fencing should be put into place along Pouchen End Lane rather than relying on existing hedges/trees as a border alongside the lane.</li> <li>• Pouchen End Lane, Chaulden Lane and the Winkwell Bridge are unsuitable for heavy vehicles including any traffic relating to the proposal’s construction or the new travellers' site.</li> <li>• The detailed highway assessment will have to consider what enforcement measures can be put in place to prevent Chaulden Lane access becoming a ‘rat run’ to the A41 and station, the existing limited capacity of the rural lane with its pinch points along the residential sections and ultimately canal bridges.</li> <li>• Suitability of Chaulden Lane and Pouchen End Lane to accommodate caravans from the proposed Gypsy and Traveller site.</li> <li>• There is no assessment or consideration as to whether Chaulden Lane can support additional traffic.</li> <li>• Chaulden Lane, for its majority of length is single track, has limited passing places and poor visibility. It is very dangerous for a variety of users and is often congested.</li> <li>• Hemel Hempstead train station / London Midland will be unable to cope with the additional passengers. As an alternative new businesses should be encouraged to locate to the industrial estate to offer greater local employment opportunities.</li> <li>• Modifying the junctions at the Northridge Way/ Fishery Road roundabout will help sufficiently to alleviate the inevitable build up of traffic at this junction and at the opposite end of Northridge Way.</li> <li>• There should be a firm commitment to a cycle track leading to the station.</li> <li>• There is no explanation of what works need to be done at specified junctions to improve traffic flow and whether this will have an impact on surrounding houses.</li> <li>• The scale of the development will necessitate modifying more traffic junctions than those specified in the plan e.g. the junction between St John's Rd/Fishery Lane, Fishery Lane/London Road the large junction adjacent to the new Aldi supermarket, and all junctions on the link road.</li> <li>• There are no suggestions for slowing down the traffic to the 30mph limit in and around the new development.</li> <li>• Is Chaulden Lane to be used for pedestrian and cycle access?</li> <li>• Additional crossings should be provided on all nearby roads (Long Chaulden, Northridge Way, Fishery Road, St. John’s Road).</li> <li>• Traffic light controls should not be installed at the Long Chaulden junction and Warners End Road junction with Northridge Way.</li> <li>• The role and timing of the Green Travel Plan needs to be better explained e.g. will it be included in the first of the planning applications for LA3 or only once the 900 houses have been built for any further planning applications?</li> </ul>	<p>help reduce some of the impact of the traffic generated by LA3 and its role is to complement other transport measures. This would include the provision of a bus loop, providing local services and facilities for new residents, linking the development to existing footways, and improvements to the cycle and footpath network. Ensuring these are in place will allow choice in travel, particularly for the shorter local journeys.</p> <p><b>Change required.</b> The master plan seeks to achieve a well-connected development. The Council agrees that the development should provide for good connectivity beyond its site boundaries. It is reasonable to explore how LA3 can better connect to the surrounding cycle and footpath network and to key destinations, as part of its contribution to sustainable transport.</p> <p>Other points raised by individuals are dealt with below under related headings.</p>	
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<ul style="list-style-type: none"> <li>• There should be parallel pedestrian and cycle route behind hedgerow / planting along Chaulden Lane (Chaulden Lane is currently unsafe).</li> </ul>		
<p>Access:</p> <ul style="list-style-type: none"> <li>• There are no feasible access points for motor vehicles apart from one in Long Chaulden and the Avenue.</li> <li>• Secondary vehicular access points is appropriate if they are for bicycles, but not if it is for cars.</li> <li>• Support for having an Emergency access point from Chaulden Lane.</li> <li>• Chaulden Lane is too narrow and busy to serve as an emergency access.</li> <li>• Do not agree with having vehicles access points from the houses or traveller's site as Chaulden Lane will not be able to cope.</li> <li>• The access off Chaulden Lane will decimate Shrubhill Common making this open space useless.</li> <li>• Consistent investment would need to be allocated to Chaulden Lane if the access is contemplated.</li> <li>• There should be another entry towards the southern end to balance out that the large majority of the new development would use the Long Chaulden exit as that way would be the most convenient to get to the town centre, M1 , A41 and railway station.</li> <li>• The Long Chaulden junction would be directly opposite an adventure playground, resulting in risk to children and congestion. There should be suitable provisions to slow down the traffic i.e. speed bumps, traffic lights, permanent speed cameras, etc.</li> <li>• The access to the site in emergency through Chaulden Lane has not been considered properly as the lane cannot support any extra traffic and is dangerous for pedestrians.</li> <li>• Are their plans to provide new footpaths across the land to the West of Pouchen End Lane to allow public access to the countryside to the west of the development?</li> <li>• It is likely that pressure will come from the developers to have other entry points (e.g. Chaulden Lane, Lindlings, Campion Road etc.). The Council must not allow the plans to be changed as these roads are congested due to the narrowness of the roads and parked vehicles.</li> <li>• Low loaders already use Chaulden Lane to access Pix Farm Lane by passing under the railway bridge then turning right. If this small road is accessible to such traffic, with some judicious widening, this could be upgraded to offer a third exit from the development.</li> <li>• Even though Lindlings/Honeycross Road/Musk Hill have recently been resurfaced they should not be opened up as these are not suitable due to the narrowness and many parked cars.</li> <li>• The access opportunities are insufficient for the volumes of traffic that the development will bring.</li> <li>• No access route to the traveller site is marked on the map.</li> <li>• The reference to Chaulden Lane serving "a limited number of dwellings" should be clarified.</li> <li>• Building plant and vehicles should not be allowed access from Chaulden Lane.</li> </ul>	<p><b>No change.</b> The two principal access points at Long Chaulden and The Avenue are logical and appropriate to serve the development. They are supported by technical work and the views of the local Highway Authority (HCC Highways). There are limited and viable alternative access arrangements available. Potential access from the existing Chaulden Vale neighbourhood and Pouchen End Lane is poor and constrained, and is unsuitable to access the proposal. The master plan does not support access taken from these points. Chaulden Lane is also constrained but could provide for an emergency access and direct access to the proposed traveller site.</p> <p>The Council accepts that Chaulden Lane is inappropriate as a primary access and this is clearly not being sought through Policy LA3 and the master plan. However, consideration has been given as to whether Chaulden Lane could provide an emergency access to serve the development and the traveller site. We have been guided throughout on highway matters by the County Council. Their advice is that Chaulden Lane could accommodate a small increase in additional traffic and is appropriate to serve as an emergency access. The Fire Service has also confirmed that they require an emergency access point in this location.</p> <p>With regards to the traveller site access, Chaulden Lane could provide direct access to serve the traveller site and thus avoid associated traffic travelling through the main residential area. In reality, it would only need to serve a low amount of traffic movement connected with 7 pitches.</p> <p>Road safety is of paramount importance in planning for proposal LA3. However, there are limited realistic options for the location of the access to serve the scheme, particularly the proposed access from Long Chaulden near to the adventure playground. The impact of the proposed Long Chaulden junction on this facility has been investigated through the transport study. A possible junction arrangement has been explored that staggers the two respective access points and includes a potential new signal controlled pedestrian crossing. This demonstrates, within the constraints of the development, a clear commitment to considering and planning for the safety of pedestrians.</p>	<p>No</p>



<ul style="list-style-type: none"> <li>• Chaulden Lane is unsuitable to accommodate an emergency vehicle as it is often impassable for much of the time.</li> <li>• It is unclear as to what is meant by primary vehicular access (as opposed to secondary or tertiary vehicular access).</li> </ul>		
<p><i>Bus service:</i></p> <ul style="list-style-type: none"> <li>• The potential bus service will not last long as the possibility of it being withdrawn is high.</li> <li>• Current bus services have recently been reduced and there are no longer any stops from the area to the station.</li> <li>• It is up to Arriva to decide what bus services they will run.</li> <li>• What guarantees are there that they will support services to the new development? Without this, the area will become very isolated for those relying on public transport.</li> <li>• There should be a bus service directly from the estate to the station, and bus links to the town centre and industrial estate.</li> <li>• The County Council aim to reduce subsidies to unprofitable bus routes shows that there can be no guarantee that any bus company would actually run a bus service.</li> <li>• The bus route should be extended as required to the southern portion of the development.</li> </ul>	<p><b>No change.</b> It is good planning practice to provide for a bus route through the new neighbourhood in order to facilitate a service and to encourage modes of travel outside of the car. The Council acknowledges that it has a limited role in the actual service provision. It will ensure a bus loop is provided as part of the development and that the new homes would be located close to stops. However, any service would be provided by the bus operating company and would be subject to viability. The Council will continue to liaise closely with the bus operating company in connection with housing growth and future bus services.</p>	No
<p><i>Parking:</i></p> <ul style="list-style-type: none"> <li>• The suitability of parking on Middle Hill and Rowcroft.</li> <li>• The opportunity should be taken to create new parking spaces for Middle Hill and Rowcroft.</li> <li>• The development will only lead to a worsening of the lack of parking at existing local shops.</li> <li>• There is insufficient parking space at Hemel Hempstead railway at Parkwood Surgery and Stoneycroft shopping centre.</li> <li>• There is no room for extra parking at Chaulden shops and it would be extremely undesirable to turn part of Northridge Park into a car park for the Stoneycroft centre.</li> <li>• The plan should say more about parking.</li> <li>• There is a danger that because there are pathways through to the development from the Chaulden Vale estate, residents of the new houses will park there instead.</li> </ul>	<p><b>No change.</b> The scheme is still at an early stage and therefore the level of detail available, for example matters such as the level of parking, is naturally limited.</p> <p>The master plan seeks to ensure the development provides for sufficient, well-located parking. This should reduce the likelihood of new residents parking in the adjoining Chaulden Vale estate, although the likelihood of this occurring is limited in reality given levels of on-street parking on these roads. The provision of a modest range of community facilities in a central location (including potentially a new surgery premises), making the scheme as accessible as possible for journeys on foot and by bike, and the provision of a bus service (subject to viability) should all help limit the need for some journeys to other local facilities.</p> <p>The Council is developing more detailed policy to guide new development in the Two Waters Area. It is discussing parking issues at Hemel Hempstead railway station with Network Rail through this work.</p> <p>The existing problem of parking on Middle Hill and Rowcroft (and other roads in the Chaulden Vale estate) has been a long standing issue. It is a separate matter from the development of LA3 and it is not for the scheme to necessarily solve this. There may be practical problems providing for such additional spaces, for example the management of the spaces for the new and existing residents.</p>	No
<p><i>Surgery:</i></p> <ul style="list-style-type: none"> <li>• Concern raised over the ability of the Parkwood Drive practice to deliver the new surgery. (DBC needs to press NHS England to provide a GP surgery at LA3.)</li> <li>• The expansion of the Parkwood surgery should not be at the expense of having a local surgery within LA3.</li> <li>• The document mentions 'support for new GP provision' but is unclear as to what the solution would be or whether firm assurances have been obtained.</li> <li>• More critical thought and concrete plans need to be investigated and finalised for the Parkwood Drive Surgery before LA3 goes ahead.</li> <li>• There are practical problems in expanding the Parkwood Drive surgery be developed to meet the needs of the new development i.e. how it will continue to operate while it is being re-developed. If</li> </ul>	<p><b>No change.</b> Policy LA3 and the draft master plan recognise the need to support improved GP services either financially or within the new neighbourhood. However, the Council is aware of the practical difficulties of improving the surgery within the existing Parkwood Drive site. The NHS / CCG have not made any decisions over exactly how future surgery needs will be accommodated. The Council will be guided by the eventual outcome of this. The master plan remains flexible over how improvements can be achieved. Discussions are on-going with the NHS / CCG.</p>	No

LA3 goes ahead a new doctors surgery must be built.		
<p><i>Infrastructure:</i></p> <ul style="list-style-type: none"> <li>• There needs to a more joined up strategy between LA3 development, creation of local jobs, better infrastructure and sustainability.</li> <li>• The school, shops and health facilities should be built first.</li> <li>• Local physical and social infrastructure cannot cope with the additional housing.</li> <li>• There is little detail about ensuring that the necessary plans will be put in place to ensure that local infrastructure is deliverable by relevant authorities.</li> <li>• Integration with other authorities seems to have been very weak.</li> <li>• Whilst not the responsibility of the Council, how can you build a development without engaging and ensuring that the capacity and handling of the local hospital takes place?</li> <li>• LA3 should not proceed until Dacorum Council have had proper, full, and transparent consultations with infrastructure providers to and ensure the essential services required to support the development are viable.</li> <li>• Whether Watford and/or Hemel Hempstead Hospitals can cope with the growth in housing.</li> <li>• The need for key supporting elements to be delivered in a timely way.</li> <li>• There is a lack of detail around supporting services for the area.</li> <li>• Insufficient water supply to cater for the new housing.</li> <li>• Whether there will be sufficient services to support the development e.g. schools, health, fire and police services, etc.</li> <li>• There is no s106 proposal to pay for establishing hard footpaths and cycle paths to the Rail Station.</li> <li>• The S106 agreement should include the provision of an adequate wildlife corridor for Shrubhill Common and to secure its future maintenance.</li> <li>• Has the need for a new transformer at Warners End sub-station been agreed with the National Grid and what is their timescale for implementing this i.e. can it be achieved in time for the start of the development?</li> <li>• Concern over whether Watford hospital can cope with an additional 2,500 extra residents.</li> <li>• 4G/3G mast will need to be provided.</li> </ul>	<p><b>No change.</b> As part of preparing its plan for the scale and location of new development in the Borough, the Council has prepared an Infrastructure Delivery Plan (InDP). The InDP provides information on a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers. Information regarding doctors' surgeries was provided by the Clinical Commissioning Group.</p> <p>The InDP is updated regularly (usually on an annual basis). The current (2015) update has been timed to take account of concerns regarding infrastructure issues raised through the Site Allocations Pre-Submission consultation and provide an opportunity to discuss these further with providers. This revised version of the InDP will accompany the Submission version of the Site Allocations DPD. This update will ensure key infrastructure concerns are raised with providers and any necessary amendments made to the DPD and accompanying Local Allocation master plans to ensure these are properly addressed.</p> <p>In consulting over proposed new development, no objections were raised by the utility providers in principle to the level of housing development identified in the Core Strategy or to the local allocations. The Council recognises the continuing need for on-going technical work and liaison with respective providers. This matter is sufficiently covered in the master plan and the need for contributions towards and timely provision of infrastructure improvements acknowledged.</p> <p>Hertfordshire County Council (HCC) is satisfied that the need for additional primary school places has been addressed through future provision of a new primary school within the allocation. Existing secondary schools can accommodate potential pupil growth. The Council accept the need for on-going liaison with HCC over planning for future secondary school places in the town.</p> <p>Decisions on the level of provision of local hospital services are the responsibility of the NHS/Hospital Trust. The Council recognises the need for on-going liaison with them, especially in connection with the future of the existing hospital site (Proposal MU/2 in the Site Allocations DPD). Policy LA3 and the draft master plan highlight the importance of supporting improved GP services either financially or within the new neighbourhood. Decisions have not been made over exactly how future surgery needs will be accommodated. Discussions are on-going with the NHS / CCG.</p> <p>The Council has and continues to liaise closely with Thames Water on potable and waste water supply issues. It is recognised that the proposal may need to provide for additional infrastructure capacity, but the provision of a temporary on-site waste water packaged treatment facility does provide flexibility in the interim. The provision of a range of water-saving measures in the new homes (Policy CS29) can help reduce general water consumption.</p> <p>The master plan (para. 4.8) does refer to the need for a new transformer at the Warners End Primary Sub-station. It also highlights (para. 4.8) the requirement for reinforcement of a section of the sewer/water pipes in order to maintain quality of service to existing customers. The need to upgrade the mobile phone network is outside of the scope of the master plan and will be a separate decision for the network providers.</p>	No
<p><i>Gypsy and Traveller Site:</i></p> <ul style="list-style-type: none"> <li>• The traveller site is against national planning policy (ref. 2012 policy for Traveller Sites) including that such sites should not be on Green Belt land).</li> <li>• A suitable brownfield site could be found for a traveller site, possibly near Maylands Avenue for access to the M1 etc. or elsewhere that would be more appropriate. Accordingly Dacorum Borough Council should review other potential sites for their suitability and dismiss the proposals for one at LA3.</li> <li>• The proposed location is unsuitable given poor access from either side of Chaulden Lane, particularly from Winkwell.</li> <li>• In order for the travellers to be fully integrated the site should</li> </ul>	<p><b>No change.</b> The Council acknowledges the Government's policy position that unmet need, whether for traveller sites or regular housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development in the Green Belt. In the case of LA3 West of Hemel Hempstead, the proposed traveller site would not be located in the Green Belt as the sites are to be formally released through the Site Allocations DPD. The principle for this approach has been tested through and established in the Core Strategy.</p> <p>The Core Strategy Inspector was satisfied that Policy CS22: New Accommodation for Gypsies and Travellers accorded with relevant Government guidance – including the NPPF and PPTS. The identification of Sites within the Site Allocations DPD in turn accords with Policy CS22. They are all well located in terms of their proximity to services and facilities, are small in scale (being less than 15 pitches in size) and are located in a dispersed pattern around settlements. They are also sites that will be clearly defined on the Policies Map (referred to in Policy CS22 and the Proposals Map). All sites have the firm support of the Gypsy and Traveller Unit at Hertfordshire County Council.</p> <p>The original technical work was prepared on a South West Hertfordshire basis by consultants Scott Wilson and included a large</p>	No

<p>either remain where it is with no access to Chaulden Lane nor Pouchen End Lane, so they are more encouraged with the new community, or the site should be repositioned to the middle for the new development to fully encourage integration into the community.</p> <ul style="list-style-type: none"> <li>• The proposal is to have no access to the Chaulden Lane which means the Travellers site should be located on the northern part of the development close to the main access by the Avenue.</li> <li>• Access to the traveller site should be from Long Chaulden or The Avenue.</li> <li>• Chaulden Lane has no room for a footpath so pedestrian access to the travellers site would be dangerous as the lane has many bends.</li> <li>• The site would be better located at the northern end of the development near The Avenue access.</li> <li>• The traveller site should be relocated to a more accessible and inclusive location on the north eastern edge of the site where its impact will be minimalised and the necessary road network and transport links generally are more developed.</li> <li>• Local residents should be compensated when their homes are devalued by the traveller site.</li> <li>• The area around the traveller's site will become littered and untidy and will become an eyesore and a dumping ground.</li> <li>• The site should be located in the Maylands Business Park, where it does not affect residential properties.</li> <li>• The deeds for some properties state that they cannot keep a caravan on their driveway, yet the Council is allowed to build a traveller site nearby.</li> <li>• Local residents have not been properly consulted about the proposed traveller site.</li> <li>• The travellers' site should not be located near to existing homes.</li> <li>• The siting of the traveller site on the southern edge of the proposal directly onto Chaulden Lane would minimise the impact overall, rather than having access through the heart of the development.</li> <li>• Affordable housing should not be concentrated around the traveller site.</li> <li>• The traveller site should have direct access to the rest of the development if we are to ensure its integration and social inclusion.</li> <li>• A travellers' site situated amongst so much housing could quickly become out of scale and begin to dominate the local community leading to tension within an already settled community.</li> <li>• The additional use of Chaulden Lane by travellers will change its character and may affect local residents' movements.</li> <li>• The site will lead either to increased traffic or occupancy in excess of seven pitches.</li> <li>• The travellers site location has not been properly thought through, as the tranquillity of the area will be lost forever.</li> <li>• Will local residents be compensated for following any resulting fall in house prices?</li> <li>• There are alternate and more appropriate sites in Dacorum / Hertfordshire which can be considered.</li> </ul>	<p>number of sites that were coded red, amber, or green - depending on the consultant's view of their suitability. All were in the Green Belt or Rural Area as no suitable urban sites were found. Many site suggestions were some distance from settlements, services and facilities and would not comply with Government guidance (or our own Core Strategy policy). In addition, the emphasis was on identifying suitable locations. Landownership was not considered in the study and, therefore, it was not clear as to how many sites in reality had reasonable prospects of actually being delivered.</p> <p>The full Scott Wilson Report is on the Council's website: <a href="http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/gypsies-travellers-study-potential-sites-(stage-2)">http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/gypsies-travellers-study-potential-sites-(stage-2)</a></p> <p>Feedback on these potential sites was sought as part of Site Allocations consultation in 2008. Following analysis of these consultation responses, a report was considered by Members regarding how and where provision should be made within the Borough. This resulted in the current policy approach of seeking to integrate sites with new 'bricks and mortar' housing. The relevant Cabinet Report is available online: <a href="http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0</a></p> <p>A brief summary of the process the Council has been through with regards to considering and assessing potential Gypsy and Traveller sites is set out in the Issues Paper the Council prepared for the Core Strategy Examination: <a href="http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement--dacorum-borough-council.pdf?Status=Master&amp;sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement--dacorum-borough-council.pdf?Status=Master&amp;sfvrsn=0</a>. This clearly explained to the Inspector the Council's proposed approach of setting strategic policies (plus a monitoring target for new pitch provision) through the Core Strategy and identifying precise pitch locations and requirements on the three largest Local Allocations (LA1, LA3 and LA5) through the Site Allocations. The specialist consultants who prepared the Council's latest Traveller needs Assessment (ORS) stated that the incorporation of new sites within new urban extensions was emerging as a 'good practice' approach.</p> <p>The potential to extend the two existing Gypsy sites within the Borough has been considered and discussed with the Gypsy and Traveller Units at Hertfordshire County Council, who own and manage both sites. They have advised that the Three Cherry Trees Lane site is already larger than the ideal site size and should not be extended. The Long Marston site is not ideally located in terms of access to services and facilities and is already considered to be of the maximum size suitable for its rural location on the edge of a village. The potential for expansion is severely limited due to land ownership (with an area of land that may have been appropriate for expansion being bought by a local farmer with the express intent of preventing this from occurring). The landowners have recently reiterated their objections to any extension of this site. There is also a written undertaking between the County Council and local Parish Council that there will be no further site expansion. Whilst this is not legally binding, it is a further constraint to expansion.</p> <p>Other sites suggested through the Pre-Submission consultation and also submitted as having development potential through the 'call for sites' process' have also been considered and discounted as realistic or appropriate options. A fuller explanation is set out in the Homes and Community Services Background Issues Paper. The text of the September 2014 version of this document has been updated to elaborate on the explanation previously given, as a result of representations received. New sites suggested have also been appraised.</p> <p>In principle, the Council accepts that providing new pitches on brownfield sites is a sensible approach. In reality it has proved difficult to identify such sites. These sites also have to have a reasonable prospect of being delivered and possess the associated infrastructure. Options are limited as half of the borough is covered by the Green Belt and other sensitive landscape designations, and given the competition for alternative uses of brownfield land. Not all non-Green Belt and brownfield sites are necessarily suitable for this purpose in terms of access, location, proximity to local facilities, etc. It is only in the case of LA5 that a location is identified in the Green Belt. This can, for example, help meet the need for Romany Gypsies in this part of the borough. Both of the traveller sites in connection with LA1 and LA3 will eventually be excluded from the Green Belt.</p> <p>Need has been identified and it is appropriate that this should be met through provision in LA3 and the other larger Local Allocations. A site can be accommodated within LA3 subject to careful design, landscaping and layout. Its impact and potential to expand can be limited if well planned and managed. The County Council has accepted the principle of access arrangement from Chaulden Lane to serve the traveller site. In reality, the level of traffic generated from the site is likely to be low. It is not always possible to locate traveller sites with ready access on to main roads given the difficulty of securing a location for new pitches.</p> <p>The location of the site is appropriate in order to avoid related traffic passing through the new housing estate. It will allow for integration but will also permit a degree of privacy between the settled and traveller communities. No decisions have been taken over the type of housing surrounding the traveller site, although it will be separated from housing by a landscape buffer and the normal</p>
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<ul style="list-style-type: none"> <li>• The current location identified for this site in the development has the benefit of quick access/egress to and from the local main roads without the travellers needing to route their vehicles through a lot of residential roads first.</li> <li>• The location of the traveller site contradicts the stated aim of maintaining the rural character of Chaulden Lane and Pouchen End Lane.</li> <li>• Residents need reassurance that this traveller site will not be fast tracked through.</li> <li>• What is to stop the traveller site from expanding and who will maintain and manage the site?</li> <li>• Travellers do not want to be housed in such a site and it is wasteful to offer it to them. What will happen to the site when they are gone or they have not occupied it?</li> </ul>	<p>approach is to distribute affordable homes across a development.</p> <p>The site is proposed to be located at a distance from existing homes and is not expected to impact on house prices. There is no mechanism in planning to compensate local residents against the impact of new development on them.</p> <p><i>Note: Legal advice is currently being sought on the implications of the Government's recent changes to the definition of Gypsies and Travellers in the Gypsy and Traveller Policy Statement. If any changes are required to the number or location of new pitches, this will be considered via the Report of Representation on the Pre-Submission Site Allocations Focused Changes. Any consequential changes needed to the master plans for consistency will be made via delegated authority.</i></p>	
<p><i>Design / Layout / Landscaping:</i></p> <ul style="list-style-type: none"> <li>• Welcome that the Development will follow best practice in urban design principles (Building for Life).</li> <li>• The houses will be dominant in the landscape and will not be in keeping with the area.</li> <li>• There is no explanation of how "integration of new communities with existing ones, maximising connectivity to shops and the rail station" is going to be achieved.</li> <li>• The southern part of the proposed development would severely impact on the visual aspect from the other side of the valley, but the northern development would be more easily screened as it is further up the hill.</li> <li>• Structural tree belt will do little to screen the development from longer views given the steeply sloping site.</li> <li>• The Housing Plot H10 should not go ahead as it is visually obtrusive from the Westbrook Hay side and also impacts on Pouchen End which is a unique hamlet and should not become part of urban sprawl.</li> <li>• The Green Belt and the countryside will be destroyed for almost the entire West flank of Hemel Hempstead.</li> <li>• The development will compromise the character, appearance and setting of the AONB to the west of the site.</li> <li>• Concerns that the new neighbourhoods do not end up, lacking in character and without any sense of identity or social cohesion.</li> <li>• The houses will be poor quality, unattractive and, leading to a loss of character that this area of Hemel Hempstead has.</li> <li>• The designs discussed are very suitable, but reassurance is needed that these will not be compromised by the developers when cost impact/profit margins are considered.</li> <li>• How are local residents going to cope with the disturbance during construction?</li> <li>• The LA3 land where not built on should be extensively planted to maintain and even enhance its current wildlife value.</li> <li>• What assurance is there that those existing properties that have always had views of the countryside across the valley will retain them following the development?</li> <li>• The development will not integrate with/will dominate the existing rural character of Pouchen End. A larger area of buffer land</li> </ul>	<p><b>No change.</b> The Council notes and welcomes the support for the scheme following best practice in urban design principles.</p> <p>The development principles in the master plan seek to secure an attractive new neighbourhood and high quality design and layout of housing and green space. The Council will judge any future development against these aims and related principles set out under Policy LA3 in the Site Allocations DPD.</p> <p>The Council accepts that the development will impact on the local and wider landscape. This has been carefully assessed through a landscape study (Landscape and Visual Issues Report (July 2012)) prepared by the developers. This identifies a number of landscape and visual issues, recognises the important role of existing landscape features on the site, and sets out a landscape strategy for limiting the scheme's impact. This includes retaining and supplementing hedges and tree belts, maintaining a treed skyline, and carefully locating and controlling the height / roofline of new development (particularly on the southern slopes). These factors have been taken forward through the key development principles in Policy LA3 and the draft master plan (see development principles under Green Infrastructure, Design and Green Belt boundary and the Countryside).</p> <p>The master plan also explains (para. 3.10) that the existing strong framework of hedgerows and tree cover together with the gently undulating landform provide a high degree of visual containment within the landscape and restricts or curtails views towards and into the area, especially from Little Heath, Bourne End / Winkwell and the eastern edge of Berkhamsted.</p> <p>There is no fundamental reason why development, albeit of a more limited scale, could not take place on the southern slopes subject to the careful design and location of new housing. This can be achieved through the retention of the south facing slope within the southern portion of LA3 as open land and restricting built development to the lower parts of the slope. In any event, the majority of the slope lies within the easement zone for the high pressure gas pipeline and therefore is constrained from some forms of built development.</p> <p>The master plan aims to ensure a well-connected and integrated development through a number of measures. These include cycle and footpath links across the development and into the existing Chaulden Vale estate, potentially developing such links as part of a wider network to key destinations, the sharing of new facilities with new and existing residents, and the provision of a bus loop as a possible extension of bus services into the proposal.</p> <p>The Council will seek to secure the highest sustainability standards applying at the time that any detailed scheme is submitted, but will have to weigh this against other considerations. Sustainability is much wider than environmental matters. There would be cost implications to achieving higher levels of sustainability, and that this needs to be balanced against viability and ultimately delivery of LA3. The Council is keen to see that the proposal does perform as best as possible, given its importance to the town. Government policy could change over time and affect how code-levels are applied (e.g. through the Building Regulations).</p> <p>The scheme is large enough to provide for a mix of housing types, sizes and tenures. The mix will need to be considered as part of a detailed assessment accompanying any future planning application. This could in theory include bungalows, and community and self-build housing, although the bulk is envisaged to be built by volume house builders and housing associations. Flats could form part of that mix, but the scheme does provide an opportunity to deliver a large number of houses, particularly family homes.</p>	No

<p>should be provided.</p> <ul style="list-style-type: none"> <li>• The layout needs to be amended to ensure that there is no additional access onto Pouchen End Lane or Chaulden Lane.</li> <li>• The proposed landscaping will not be effective in screening the development.</li> <li>• All buildings should be built to the highest possible standards of energy sustainability and environmental sustainability, rather than the minimum standards in place at the time of construction.</li> <li>• The development must be zero carbon, not just building to the highest code.</li> <li>• The whole development should be low impact, zero carbon, far exceeding Herts Building Futures, in the light of IPCCs latest report on climate change (Oct 2014).</li> <li>• Houses should be limited to 2 storeys throughout.</li> <li>• The natural slope of the land gives excellent potential to include active solar PV in the design of the buildings.</li> <li>• There should be firm plans to put solar panels on the roof of every new house in this development.</li> <li>• Visual amenity has not been taken into consideration for existing residents on the adjacent built-up areas.</li> <li>• H10 'Pouchen' needs to be reworked such that no additional access onto Pouchen End Lane or Chaulden Lane is required and the traveller site relocated to the north eastern edge of the site.</li> <li>• It is not appropriate to marginalise people in the extreme corner of the site at H10 as it suffers from poor connectivity and is furthest from buses, school, community hub and shops, etc.</li> <li>• A clearer explanation is required to explain what separation there will be between new and existing properties.</li> <li>• It is important that any new houses built on the boundary of LA3 are in keeping with the existing houses that will be adjacent to it.</li> <li>• The development needs to take account of and limit its impact on Musk Hill.</li> <li>• There should be small bungalows for the elderly.</li> <li>• It is unclear what is meant by a 2 ½ storey house.</li> <li>• New housing should not be provided in the form of flatted development or 3 storey townhouses, but should provide for small affordable houses with gardens.</li> <li>• Concern that the new tree lines will cut off the views towards Little Hay, Westbrook Hay and Bourne End.</li> <li>• The chances of good quality design of this mass housing is unlikely especially as the major house builders are looking to cut costs and maximise profits.</li> <li>• Co-operative self-build housing could help to foster 'community' and deliver some of the 'social housing' – in the spirit of Hemel Hempstead new town development.</li> <li>• The layout should reflect existing patterns of drainage on the land incorporating SUDS alterations, not disrupt it. It should inform the housing layout not the reverse.</li> </ul>	<p>The heights of housing will be an important issue given the topography of the site. However, the Council considers that it would be unreasonable to strictly limit all new homes to two storeys only. It does not want to stifle innovation in design and, if handled sensitively and in appropriate locations, a small number of taller buildings can help achieve variety and create focal points within the development. The master plan is clear (para. 5.18) that their scale will take account of the location of each housing area in relation to surrounding uses and the countryside.</p> <p>The Council has recognised that the development will have an impact on the hamlet and adjoining countryside and that this needs to be addressed. To this end the master plan sets out a series of principles to ensure the amenities and character of Pouchen End and countryside are protected (see in particular the development principles under Green Belt boundary and the Countryside). This demonstrates a clear commitment to addressing such concerns.</p> <p>The Council will seek to ensure that the proposal is delivered to as high a sustainable standard of design and construction as is possible subject to achieving other development objectives in the master plan and ensuring the viability/delivery of the scheme as a whole. The master plan makes clear of this general intention (see paras. 4.13, 4.14 and 5.32). There could be opportunities for the installation of solar panels, and the details of this and other energy saving measures can be considered as part of taking forward the development.</p> <p>2 ½ storeys houses normally refer to the use of the roof area of a 2 storey property as habitable space.</p>	
<p><i>Green Space / Green Infrastructure / Open Space:</i></p> <ul style="list-style-type: none"> <li>• More hedgerow wildlife corridors should be saved and remain in place</li> <li>• Support for the development being subdivided by green space</li> </ul>	<p><b>No change.</b> The Council agrees that the existing landscaping should be retained and this is made clear in the master plan (e.g. para. 4.3). It welcomes the support for the development being subdivided by green space and surrounded by trees to mitigate the visual effect.</p> <p>The proposal provides for a significant level of green / open space. This should ensure a good balance between land available for</p>	<p>Yes</p>



<p>and surrounded by trees to mitigate the visual effect.</p> <ul style="list-style-type: none"> <li>• Given the impact that LA3 could have on the Shrubhill Common LNR, there should be an environmental impact study to demonstrate that the proposed "wildlife corridor" along the eastern side of the development adjoining Fields End will be fit for purpose.</li> <li>• The green link from Shrubhill common across LA3 should be a corridor of grassland which is only mown once per year and not used for recreational purposes, in order to be considered a real wildlife corridor.</li> <li>• Whilst providing some recreational advantages, the infrastructure of 'green grid open spaces and movement corridors' does not address the core issues arising from the proposed development.</li> <li>• Given the need for surface water balancing, the amount of usable open space for recreational purposes is minimal.</li> <li>• The green link from Shrubhill common across LA 3 should be described in more detail.</li> <li>• Mown grass is not suitable green infrastructure for humans or wildlife.</li> <li>• The ideal wildlife corridor would run up the NE side of LA3, alongside the Chiltern Way, and could incorporate the Hay Meadow that already exists at the southern end of this route.</li> <li>• The impact of the Green Infrastructure on surrounding areas and particularly existing local residents has not been fully considered.</li> <li>• It is important to maintain all of the existing hedgerows in their existing state in order to maintain the biodiversity of the site e.g. there should be no cutting, lopping or flailing of any of the hedges, property boundaries should stop well short of the hedges on each side, and roads through the hedges should be kept at an absolute minimum (and where possible make use of existing gaps in the hedges).</li> <li>• Support for a wildlife corridor along the eastern side of the development adjoining Fields End, but this needs to be wider to fulfil its function.</li> <li>• The central corridor across the site cannot be described as an extension to Shrubhill Common, unless it is maintained in the same way as the LNR e.g. it is left un-mowed and not used as formal or informal playing fields.</li> <li>• The existing hedge to the east should be safeguarded by ensuring that there is no private property adjacent to it.</li> <li>• Insufficient usable open space due to road network.</li> <li>• The "wildlife corridor" is very close to one of the main access points.</li> <li>• The open space is a laudable aspiration so long as it properly maintained.</li> <li>• The number of houses should be reduced to create more green space.</li> <li>• There should be firm plans for allotments.</li> <li>• There is limited open space for parcels H1, H2, H3, H4, H5, H6 and H7.</li> <li>• Local people should be involved in the planning of the proposed parks.</li> <li>• Support for junior playing fields but concern over how the traffic</li> </ul>	<p>drainage and recreational purposes. In addition, it is often possible to incorporate SuDS features within the design of open spaces.</p> <p>The Council considers the development will provide for ample amounts of open space relative to the level of overall development proposed. It is in excess of national standards (see para. 5.7 of the master plan). Each neighbourhood and respective residential parcel will have access to a network of green and open spaces.</p> <p>The master plan already refers to a potential location for an allotment (see Plan 4). This can provide opportunities for productive green space. The details can be firmed up once a detailed scheme is progressed.</p> <p><b>Change required.</b> The points raised regarding the Shrubhill Common LNR extension / wildlife corridor are covered in response to comments above from the County Council's ecology officer. The Council accepts the need for careful management of the green space if it is to be of ecological value and a change to the master plan is proposed. The level of such detail provided in the master plan is considered to be reasonable given the current early stage reached by the proposal.</p> <p>The north-south running green corridor / tree belt is considered reasonable given the extent of green infrastructure and open space elsewhere across the LA3 site. The latter, if appropriately managed, can perform a valid ecological role. In reality, the north-south corridor would be disrupted in securing the main access point from The Avenue. However, the Council accepts the need for a sensitive relationship between new housing and the existing hedgerows and an amendment to the master plan to reflect this is justified.</p>	
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<p>attending matches would be regulated.</p> <ul style="list-style-type: none"> <li>• There should be reference to useful productive green space (e.g. as fruit trees and allotment gardens) and such space should be multi-functional to benefit wildlife, be productive for local residents and contribute to landscape quality.</li> </ul>		
<p><i>Affordable Housing:</i></p> <ul style="list-style-type: none"> <li>• Should the affordable housing be dispersed throughout the development?</li> <li>• Of the affordable housing proposed, the rental sector should be public sector housing, preferably council housing with the housing authority having nomination rights to other social housing. The accommodation on offer should include 3 and 4 bedroom houses to meet the needs of families in Dacorum.</li> <li>• Will the affordable housing be set aside for local people in need?</li> <li>• More of the new housing should be made affordable given local housing need.</li> <li>• What standard will the affordable housing be built to?</li> <li>• All of the housing should be integrated together with affordable houses.</li> </ul>	<p><b>No change.</b> It is normal practice to disperse affordable housing across a development. This approach will be followed in planning the proposal (para. 5.22 of the master plan). The mix and type of affordable housing will be guided by the latest needs assessment and advice from the Council's Strategic Housing team. At present there is need across the board for all types and sizes of affordable homes. Nominations for affordable housing will be subject to the Council's and/or relevant housing association's housing allocation policy. To be eligible for the Council's housing register applicants need to satisfy local connection criteria. This will normally give priority to local residents.</p> <p>The affordable homes should be designed to the Homes and Community Agency design and sustainability standards<sup>1</sup> or their equivalent (para. 5.22 of the master plan).</p>	No
<p><i>Drainage/Flood Risk/Ground Condition:</i></p> <ul style="list-style-type: none"> <li>• No assessment has been made as to whether sufficient drainage can be achieved / appropriately and adequately drained.</li> <li>• Insufficient consideration has been given to surface water attenuation – flooding regularly occurs towards the lower part of the site, but has not been taken into consideration.</li> <li>• There should be a very clear assessment of how such a development would impact on the existing aging sewerage system.</li> <li>• Surface water drainage should be kept in the area to preserve the chalk streams.</li> <li>• The water must be treated locally (e.g. using a local water treatment plant for both road run-off and sewage), rather than being processed at Maple Cross.</li> <li>• Need to ensure the endangered chalk streams are preserved.</li> <li>• The flooding assessment does not reflect the reality of the situation e.g. flooding is already an issue at the Fields End estate (notably various residents have been regularly flooded over the years, due to a drainage system that was never installed during the building of Fields End.</li> <li>• Insufficient consideration given to flooding on the lower part of the site.</li> <li>• Concern over the impact of the proposal on water supply, flooding and eventual sinks holes.</li> <li>• Surface water needs to be kept in this area to save the chalk streams and it should be treated locally before returning to the streams in this area, not at Maple Cross.</li> <li>• There is no reference to ensure that there is sufficient water supply for this significant number of new houses.</li> <li>• The current inadequate foul water system needs proper consideration and design long before Thames Water's economies</li> </ul>	<p><b>No change.</b> Water supply and related infrastructure matters have in part been dealt with above, in responding to issues on infrastructure and the work with utility providers (through updates of the Infrastructure Delivery Plan).</p> <p>There is ongoing liaison with the Environment Agency and Thames Water concerning water and drainage, and associated infrastructure. The landowners have already prepared a drainage statement (Land at West Hemel Hempstead, Flooding and Drainage Assessment (July 2012)) setting out the issues and what needs to be addressed. The master plan makes clear that the development must address capacity and surface drainage issues within and on the edge of the site, supports water conservation measures and seeks to limit future run-off rates to no more than the site currently generates as a greenfield site.</p> <p>The Council's preference is for a permanent solution to sewage treatment. However, phases of construction may not necessarily coincide with the timing and availability of all upgrades. The on-site packaged water treatment works would only be needed for a temporary period and to allow development to proceed in the interim. If required, the master plan emphasises that it would be designed to ensure no loss of amenity to existing or future residents. The need for and role of the treatment works will be kept under review through ongoing discussions with Thames Water / Environment Agency as the scheme is advanced to the planning application stage.</p> <p>The Long Chaulden access road will be designed and constructed to accommodate the balancing pond.</p> <p><b>Change required.</b> The master plan should also emphasise (following proposed "Focused Changes" to related Policy LA3 in the Site Allocations DPD) the need for early liaison with both Thames Water regarding preparing a drainage strategy and the local planning authority concerning sustainable drainage. Any application will also require a flood risk assessment. This will require updating the master plan.</p> <p>Related to the issue of waste water is sustainable drainage. This issue and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations are already highlighted within the Delivery and Phasing section of each relevant policy. However, since publishing the Pre-Submission version of the Site Allocations document the Government has confirmed a change in approach to how development schemes will be assessed. Rather than a dual system when the local planning authority consider the planning application and the SuDS Approval Body (SAB), SuDS issues will now be dealt with through conditions on planning applications, following liaison between the LPA and SAB. The Council has prepared a short guidance note to explain how the new system will be operated. A minor change is required to the text of the 'Delivery and Phasing' section of the policy to ensure references are made to the correct advisory bodies. Similar amendments will also be required to the master plan.</p>	Yes

<sup>1</sup> <http://www.homesandcommunities.co.uk/ourwork/design-and-sustainability-standards>

<p>of scale arguments are accepted.</p> <ul style="list-style-type: none"> <li>• A sewage treatment plant is inappropriate, no matter how temporary.</li> <li>• Given the size of this development, a permanent sewage solution must be a priority and implemented before or during the early development phase.</li> <li>• A permanent solution for sewage must be part of the development plans and build before or during the first building phase, a temporary solution is not acceptable.</li> <li>• The temporary water treatment plant at the southern end of the site will not be acceptable to local residents due to likely problems of foul smells in the area.</li> <li>• The Sustainable Water Drainage provision must ensure that all rain water is allowed to percolate into the underlying chalk without being ducted away to other locations.</li> <li>• Metered Water use must be restricted by using rain water butts in domestic gardens, and other water conservation measures.</li> <li>• There will be considerable extra pressure on the general infrastructure, particularly water (pressure is already very low) and sewerage.</li> <li>• Recent flooding experience in Leverstock Green and elsewhere suggests this problem needs much greater examination than it has so far been given.</li> <li>• The area covered by the LA3 development is effectively a giant soakaway protecting Chaulden Lane and the surrounding areas from serious flooding.</li> <li>• The field at the bottom of residential area H10 is already prone to flooding after heavy rain, so permanent solutions need to be installed</li> <li>• There is a history of flash flooding towards the lower end of the valley affecting households during heavy rainstorms. Water should be retained within the catchment area and this will not happen with a man-made drainage system unless structures and systems are put in place.</li> <li>• The lower field of the plot flooded recently which filtered down to the Winkwell Hamlet, saturating a large area with sewerage.</li> <li>• A temporary sewage treatment plant will cause difficulties for residents.</li> <li>• The previous sewerage network suffered for years when the Chaulden Vale estate was built in the 1980s.</li> <li>• There is a need to ensure that all hard surfaces are permeable.</li> <li>• Concern over the position of the access road on Long Chaulden and whether this will affect the existing balancing pond.</li> <li>• A development of this scale will require a significant surface water balancing area.</li> </ul>		
<p><i>Indicative Layout:</i></p> <ul style="list-style-type: none"> <li>• There is insufficient detail in the Indicative Layout to comment in any detail. What stage of this process will this information be made available for comment?</li> <li>• The indicative layout does not contain plans for a suitable wildlife corridor, or extension to Shrubhill Nature Reserve.</li> </ul>	<p><b>No change.</b> It is not possible for the Council to provide a detailed layout at this early and high-level stage of the development. The master plan sets out the current available understanding on the layout of the proposal. Such detail will emerge as the proposal is advanced towards the planning application stage. There will be associated consultation at relevant stages.</p> <p>Plan 4: Green Infrastructure in the master plan does refer to the Shrubhill Common extension. This shows the extension running centrally east-west through the proposal. Comments on the wildlife corridor are dealt with above.</p>	<p>No</p>



<p><i>Phasing/Delivery:</i></p> <ul style="list-style-type: none"> <li>• The phasing program is too vague.</li> <li>• A construction period of 7.5-9 years is an inordinate length of time to subject existing residents to the noise disruption and economic uncertainty that will undoubtedly be generated should this development proceed.</li> <li>• Local residents will be subjected to noise and site traffic over a considerable number of years.</li> <li>• When will local residents be advised as to the programme relating to the Travellers site?</li> <li>• The phasing has not specified that bus routes, walking and cycling routes to the Station, the community hub, medical services or educational provision will be in place for the first residents.</li> <li>• Consideration must be given to how noise, dust, traffic disruption and so on might be mitigated over the construction period.</li> <li>• What noise pollution studies have been carried out on similar developments to ensure that existing residents will not be affected by all the construction traffic and building works?</li> <li>• What assurances can be offered on the plan not being changed or watered down before being put into effect?</li> <li>• It would be helpful to include some robust performance measurements in the implementation of the plan and some regular transparent reports to the public on progress and, most importantly, the open reporting of any changes made to the Plan.</li> <li>• It is vital that developers plans during the 'Construction Phase' is fully understood, communicated and all of the reasonable feedback from the residents is acted upon.</li> <li>• All due planning processes should be carried out without short cuts even though the housing demand might increase over the timescale.</li> <li>• If justified, should the housing be delayed e.g. less housing needed as fewer demands?</li> </ul>	<p><b>No change.</b> The master plan sets out the current available understanding on the timing of the development. This provides a broad indication of the phasing of elements of the proposal (see Chapter 6 in the master plan). It is not possible for the Council to provide a detailed timetable at this early and high-level stage of the development. Such detail will emerge as the proposal is advanced towards the planning application stage. There will be associated consultation at relevant stages.</p> <p>The Council recognises that the development can lead to noise and disturbance for local residents during the construction phase. A scheme of this size is inevitably going to take a number of years to complete and the Council has not control over this. However, it is in developers' interest to minimise their effect on the local environment, to ensure they behave considerately to the public and act as "good neighbours" as far as is reasonable. Many developers are registered under the Considerate Construction Scheme (<a href="http://www.ccscheme.org.uk">www.ccscheme.org.uk</a>). The Code of Considerate Practice commits those sites and companies registered with the Scheme to care about appearance, respect the community, protect the environment, secure everyone's safety and value their workforce. This scheme does encourage constructive dialogue between residents and the developers and for reasonable action to be taken where appropriate.</p> <p>This development and all the other local allocations will have to follow due process.</p> <p>The Council anticipates that there will be further consultation on the scheme as it is progressed, although at this early stage the form and timing of this is not yet known. Developers are generally encouraged to undertake early pre-application engagement with the public and key consultees, particularly on larger developments. Once the master plan is adopted by the Council no formal changes will be made to the document. If there are subsequent changes in circumstances affecting the master plan (e.g. amendments to national planning policy) then these can be reflected through requirements under the planning application process. The Council can report on the implementation of the master plan through its annual monitoring of policies and schemes as set out in the Council's Annual Monitoring Report.</p>	
<p><i>Consultation process:</i></p> <ul style="list-style-type: none"> <li>• The overall consultation process has not been effective, accessible, transparent or user friendly.</li> <li>• Doubt that the feedback from this process will be collated correctly and acted upon diligently.</li> <li>• The publicity of the Core Strategy was poor, with mail drops seemingly restricted to those houses on the immediate border to LA3.</li> <li>• The July/August 2013 Consultation questions were disingenuous, phrased in such a way that it is difficult to object to worthy principles. It is the practicalities, not the principles that are the problem here.</li> <li>• The consultation has been complicated and time-consuming.</li> <li>• There has been no information on the proposed Gypsy site at the end of Chaulden Lane.</li> <li>• The Council has not taken residents opinion into account in their plans.</li> <li>• Apart from the current consultation, residents have not been approached for any other feedback.</li> </ul>	<p><b>No change.</b> The Statement of Community Involvement (SCI) is the Council's statement of policy on public consultation for planning documents (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has complied with the SCI in preparation of the Site Allocations document and associated master plans.</p> <p>A full summary of the consultation undertaken by the Council on both the Core Strategy and the current Site Allocations document are contained in the relevant Reports of Consultation and Report of Representations. All of these documents are published on the Council's website and their content has been reported to Members at the appropriate time. It should be noted that the Council intends to review and update its SCI prior to beginning consultation on its new single Local Plan.</p> <p>The Council endeavours to make the overall process as user-friendly and as convenient as reasonably possible, although it accepts that there are often procedural / technical / legal matters that are not so easy to simplify. The Council made available and accepted paper copies of responses to the consultation process. It also made documents available at a number of deposit points and local libraries to ensure copies could be inspected without the need for the internet.</p> <p>Detailed layout plans on all the proposals will follow when schemes progress to the planning application stage. There will be further consultation as part of that process.</p>	No

<ul style="list-style-type: none"> <li>• The documentation on line was hard to navigate and people with no computer or internet skills would have struggled to find information.</li> <li>• Those without the Internet have been effectively excluded from the process.</li> <li>• The LA3 workshops held in the summer of 2013 were selective and did not represent proper community engagement.</li> <li>• Consultation has only happened after the proposal was approved through the Core Strategy and residents had little to no say in what was happening or any detail.</li> <li>• As these plans are implemented, will residents find out to what extent the Draft Master Plan is adhered to and how the plan actually develops moving forward?</li> </ul>		
<p><i>Ecology:</i></p> <ul style="list-style-type: none"> <li>• The absence of UK BAP priority species in the ecology studies is queried - there are considered to be breeding colonies of some UK BAP priority species within Shrubhill Common.</li> <li>• Despite the ecology study report findings, there are Great Crested Newts which live in the plot.</li> <li>• Any development of the LA3 site will have a negative effect on the biodiversity of Shrubhill Common which currently has open countryside in close proximity.</li> <li>• The negative effect the development will have on biodiversity can be largely mitigated by the provision of an adequate wildlife corridor which could comprise of the whole of H1, H2 and H7 or the eastern boundary of H1, H2 &amp; H7.</li> <li>• The wildlife corridor could include a grass and hedged path (not paved) down the middle of the strip which would provide a route to and from Shrubhill Common for walkers and dog-walkers.</li> <li>• The ecology of all the wildlife living in the area has not been properly considered.</li> <li>• There is a rich abundance of wildlife that lives within the development area of LA3.</li> <li>• Site clearance should be undertaken outside the breeding season and mitigation should be considered through the detailed design process.</li> </ul>	<p><b>No change.</b> The ecology study (Ecological Survey of Land at Fields End, Hemel Hempstead (May 2011)) undertaken followed normal survey practice, including a desk top and field surveys. No UK BAP Priority Species were recorded from the survey area. All habitats and plant communities recorded on the site are common and widespread in a local and national context. The information contained within the study did not identify the presence of UK BAP Priority Species at Shrubhill Common LNR.</p> <p>The proposed green infrastructure, particularly the extension of Shrubhill Common, should help limit the impact of the development on the LNR and provide for continuing links through the development to the wider countryside. The ecology study set out a number of recommendations including incorporating all the existing hedgerows and trees on site into the design of the development with suitable buffer zones, planting-up the hedgerow gaps with native species, instigating a mowing regime on any retained rough grassland and removing non-native species. This broad approach has been taken forwarded in the development principles of the master plan.</p> <p>Issues regarding the suitability of the wildlife corridor are considered in the responses to comments from the County Council's Ecology Officer. The suggestion regarding the incorporation of a hedge lined footpath link through the wildlife corridor can be considered in taking forward the proposal.</p> <p>The Council agrees that care needs to be taken over the timing of the site clearance and preparation, in order to minimise its impact during the breeding season.</p> <p><b>Change required.</b> Some changes to the master plan is justified to reflect the work of the Hertfordshire Local Nature Partnership (LNP), in partnership with the Herts and Middlesex Wildlife Trust as well as Hertfordshire County Council and the Herts Environmental Record Centre, in producing a report on Hertfordshire's Ecological Networks following a county-wide mapping project. The intention is for the mapped ecological networks to be used by local planning authorities to inform forward planning and development management decisions. This assessment of ecological networks identifies strategic priorities and which habitats need to be maintained, restored and created based on a relative scale.</p> <p>Whilst this information should be used to inform detailed design of the site and what measures can be incorporated to meet ecological objectives, areas of predicted high priority for restoring ecological networks will not normally preclude a site from being a proposed strategic land allocation for development. The NPPF makes it clear that development should provide an appropriate net gain in biodiversity and that development can be a positive mechanism for restoring ecological networks. This level of detail relating to biodiversity enhancements and appropriate landscape and habitat designs should be set out within any planning application.</p>	Yes
<p><i>Heritage:</i></p> <ul style="list-style-type: none"> <li>• There are a number of notable properties that could be put at risk from the development and compromised.</li> </ul>	<p><b>No change.</b> See response to comments from English Heritage in respect of built heritage.</p>	No
<p><i>Individuals who agreed made the following comments:</i></p>		
<p><i>Access:</i></p> <ul style="list-style-type: none"> <li>• Support for proposed access arrangement/ avoiding access from</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	No

<ul style="list-style-type: none"> <li>existing roads.</li> <li>Support for separate access for the traveller site.</li> </ul>		
<b>Landowners</b>		
<i>Landowners who disagreed made the following comments:</i>		
<p>The field currently part of the LA3 allocation, but not part of the master plan area, should be included in the proposed development boundary. The landowner has been in discussions with Barrett Homes over the last few months about the purchase of this land to be used as green space to offset for more density on development.</p>	<p><b>Change required.</b> The Council accepts that it would be logical to incorporate the land into the master planning area. It therefore supports a related change to the master plan maps. This will not result in any change to the land's notation or potential development status. If it were to arise, any development on this land would need to be considered in the context of the objectives and principles set out in Policy LA3 in the Site Allocations DPD and the master plan.</p>	Yes
<ul style="list-style-type: none"> <li>Generally in support of the proposal.</li> <li>A travellers' site should not be located so close to the existing hamlets of Pouchen End and Winkwell.</li> <li>It is unclear the extent of land required for the traveller site.</li> <li>The physical constraints of the site mooted for the travellers' pitches would appear to make this an impracticable proposition e.g. changes in ground level and need for significant re-grading of the land.</li> <li>The extent of the land-take for the site (including a buffer) could require a depth of upwards of 100m taking it to within very close proximity of the existing hamlet of Pouchen End.</li> <li>The access from the strategic road network to the traveller site is poor.</li> <li>The proposed location for a travellers' site could more appropriately be used for self-build plots.</li> <li>Pouchen End Lane has increasingly become a 'rat-run' and it should be part closed to through traffic</li> <li>Winkwell and a section of Chaulden Lane (at its western end) should include one-way restrictions.</li> <li>Existing cul-de-sacs Musk Hill and Lindlings could be extended to help assimilate traffic from LA3 into the existing road network.</li> <li>The 'emergency link/access' indicated off Chaulden Lane should afford general access to serve the development.</li> </ul>	<p><b>No change.</b> Support for the proposal noted and welcomed.</p> <p>There is identified need for additional traveller pitches and LA3 is an appropriate location to meet some of this need. This general approach is supported by the County Council's Gypsy and Traveller team. Only a relatively small area is required for the traveller site and there is no reason why this cannot be practically incorporated into the existing topography of the site. The traveller site will be sensitively located and well designed and landscaped and, therefore, it should not significantly impact on the hamlet of Pouchen End. If self-build properties are to be provided, then there are plenty of other opportunities for this form of development across the site.</p> <p>The master plan makes clear that no vehicular access is to be secured from the existing Chaulden Vale estate. This position is supported by the local Highway Authority. Chaulden Lane is to provide emergency access for the development and access to the proposed traveller site. It is not appropriate for general access into the development. However, it could serve a small number of dwellings, although this would need to be subject to further traffic analysis and review as the proposal is progressed.</p> <p>The Council accepts the need for future management of the local rural roads surrounding LA3, and this can be considered in taking forward the proposal and in conjunction with the local Highway Authority.</p>	No
<ul style="list-style-type: none"> <li>Reference should be made in the text under "Highways" for an access from Chaulden Lane, details to be further investigated.</li> <li>Green infrastructure and open space should be provided as an integrated and holistic inclusion.</li> <li>The provision of pitches for Gypsies and Travellers should be deleted.</li> <li>The phasing of housing should be reconsidered having regard to further work on access from Chaulden Lane.</li> <li>A whole Site Surface Water Drainage Strategy should be an imperative.</li> <li>The "Green Belt and the Countryside" should refer to the retention of mature trees and hedgerows.</li> <li>The Primary School and Community facility should be less dominant in the area's character with a minor shift in location.</li> <li>The delivery should make clear it will be as part of a single Planning application, and the phasing should be reviewed as part of the ongoing works relating to access from Chaulden Lane.</li> <li>Oppose the inclusion of the travellers' site within the allocation. It</li> </ul>	<p><b>No change.</b> The two principal access points at Long Chaulden and The Avenue are logical and appropriate to serve the development. They are supported by technical work and the views of the local Highway Authority (HCC Highways). There are limited and viable alternative access arrangements available. Alternative access from the existing Chaulden Vale neighbourhood and Pouchen End Lane is poor and constrained, and is unsuitable to access the proposal. Chaulden Lane is also constrained but could provide for an emergency access and direct access to the proposed traveller site.</p>	No

<p>would be better to provide the site remotely from the urban edge where adequate provision can be made to meet the travellers' needs.</p> <ul style="list-style-type: none"> <li>• If the traveller's site remains part of the adopted Site Allocation plan, then provision should be made to ensure its delivery as part of an overarching single planning application dealing with the entirety of the site, rather than the potential for piecemeal applications.</li> <li>• We consider that the Chaulden Lane frontage has access opportunities to provide a third means of access serving a number of units. The phasing should take into account this viable alternative means of access, which could be included as a Phase I provision.</li> </ul>		
<p>Grand Union Investment:</p> <ul style="list-style-type: none"> <li>• LA3 was allocated within the Core Strategy (September 2013) prior to the publication of the Sinclair Knight Merz (SKM) Green Belt Reviews Purposes Assessment (November 2013) prepared as part of DBC's Early Partial Review (EPR) evidence base. LA3 is located within parcel "GB10", which the SKM report considers to make a "significant" contribution towards 4 out of 5 Green Belt purposes considered within the report.</li> <li>• The site is identified by SKM as being within the Strategic Gap between Hemel Hempstead and Berkhamsted. This location should be borne in mind in the future development of the site.</li> <li>• Acknowledge that the landscape of the site and views into and from the development should be considered in defining the areas for development. This might be addressed through new and improved green infrastructure, particularly along the western boundary in order to mitigate the impact of new development on the wider part of the Green Belt at this location.</li> <li>• Hemel Hempstead is approaching capacity in terms of new housing growth. Other important settlement such as Berkhamsted, as the second largest market town, must now take some of this future growth as part of the Core Strategy Early Partial Review process.</li> <li>• The unit capacity needs to be tested further through more detailed master planning, transportation, Green Belt and landscaping impact assessments and is more likely to reduce than increase.</li> <li>• Views from the wider landscape of the Bulbourne Valley will be compromised by the proposed development at LA3 and the design approach will need to acknowledge this. Further work is required to refine the draft LA3 masterplan to ensure that it has as minimal an impact as possible on the wider landscape and views towards Hemel Hempstead. This could well have a negative impact on the residential capacity of the site.</li> <li>• Disagree that there are "limited views of the development" from the west as the site is highly visible from both sides of the Bulbourne Valley to the west. More structural landscaping is likely to be required to mitigate the impact of development on the wider landscape.</li> <li>• Stress the importance of integrating sufficient mitigating measures within the Masterplan to adequately address the impact that the scheme will have on wider Green Belt to the west of the site.</li> </ul>	<p><b>No change.</b> The Council considers that Policy LA3 and the associated master plan adequately acknowledge and address the matters raised. It is in agreement that there is a need to ensure the impact of the development on the Green Belt and views from the wider countryside / cross valley views are appropriately mitigated.</p> <p>The issue of whether Hemel Hempstead has reached capacity in respect of new housing growth and the subsequent role of Berkhamsted is outside the scope of the Site Allocations and master plan documents. These are matters that can be reasonably dealt with in considering future housing growth through taking forward the new Single Local Plan (incorporating the partial review of the Core Strategy).</p>	<p>No</p>

<ul style="list-style-type: none"> <li>The representations should be read in conjunction with other responses submitted in August 2013 as part of the previous draft LA3 masterplan consultation and in response to the Council's Site Allocations consultation Document (September 2014) in November 2014.</li> </ul>		
<p><i>Landowners who agreed made the following comments:</i></p>		
<ul style="list-style-type: none"> <li>Makes good use of the land available. Sensible extension of Hemel Hempstead. Pouchen End Lane good choice of new Green Belt boundary.</li> <li>Support for the Draft Masterplan for LA3.</li> <li>The development should come forward sooner.</li> <li>Will the site come forward in phases or under one planning application covering the whole of the site?</li> </ul>	<p><b>No change.</b> Support noted for the proposal and draft master plan.</p> <p>The Core Strategy envisaged all six Local Allocations being delivered from 2021 onwards and phasing continues to be justified. There have been no significant changes in circumstances since the adoption of the Core Strategy and in consulting on the Site Allocations DPD, to justify bringing forward LA3 sooner. Policy CS3 provides sufficient flexibility for this to happen, if required. However, there will need to be a lead in period in order to allow practical delivery from 2021. In practice, this will mean that an application for this site will be received and determined in advance of 2021 and that site construction and works may actually take place ahead of the specified release date to enable occupation of new homes by 2021. This approach is considered to remain appropriate and will ensure that the Council can continue to demonstrate a 5 year housing land supply as required by the NPPF. This approach is consistent with the wording of paragraph 6.28 of the Core Strategy.</p> <p>In terms of Hemel Hempstead itself, there are significant housing opportunities within the town in the short to medium term without the need for LA3.</p> <p>Flexibility already exists under Policy CS3 to bring forward Local Allocations in order to maintain a five year housing land supply. Paragraph 6.28 already adequately addresses the issue of the timing of applications and infrastructure for the local allocations. The approach is consistent between the Policy and the master plan.</p> <p><b>Change required.</b> The Council is keen to ensure delivery of a comprehensive form of development and associated works (such as foul water drainage) and other contributions. This can be difficult to achieve where a scheme involves a series of landowners, such as at LA3. The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). The Council considers a further related update to the policy is required to cover this matter alongside changes to the master plan. Local Allocations LA1, LA4 and LA5 are also in multiple ownerships. Policies LA1, LA4 and LA5 and their master plans should be similarly amended to ensure a consistent approach across schemes towards achieving comprehensive development.</p>	<p>Yes</p>
<ul style="list-style-type: none"> <li>The Plan reflects the results of the technical reports commissioned over some years.</li> <li>The constraints and opportunities have been recognised, considered, and where further work is to be done, this has been stated in Policy LA3.</li> <li>Support for the 2 principal points of access from Long Chaulden and The Avenue, no vehicular access from Pouchen End Lane, limited access from Chaulden Lane, and that other points of access are for footpath and cycles only.</li> <li>Any footpath and cycle access to the west of the Allocation will need to be by existing rights of way, as public access through land immediately to the west of Pouchen End Lane cannot be delivered.</li> <li>Provision of the Community Facility in the middle of the development is appropriate.</li> <li>The extension of Shrubhill Common in an east-west direction will reduce the visual impact from across the Bulbourne Valley.</li> <li>There should be the opportunity for occupation of dwellings before 2021 if needed.</li> <li>The Master Plan is appropriate and deliverable.</li> </ul>	<p><b>No change.</b> Support noted for the master plan, access arrangements, community facilities and the extension of Shrubhill Common.</p> <p>See response above on the timing of the development.</p> <p><b>Change required.</b> The restricted public access through land immediately to the west of Pouchen End Lane is noted. The LA3 master plan can be updated accordingly to clarify the need for access to new footpath and cycle routes to be via the existing rights of way.</p>	<p>Yes</p>



Taylor Wimpey: Taylor Wimpey fully supports the contents of the masterplan having jointly prepared it with the Council.	No change. Support noted.	No
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ISSUE: Master Plan: Local Allocation LA4		
<b>Number of people/organisations responding</b> 8		
<b>Supporting -</b>		
Key organisations	2	
Individuals	0	
Landowners	0	
<b>Total</b>	<b>2</b>	
<b>Objecting -</b>		
Key organisations	4	
Individuals	1	
Landowners	1	
<b>Total</b>	<b>6</b>	
<b>NOTE. Some local residents wishing to raise concerns regarding the LA4 development did so by responding to the consultation on Policy LA4 of the Pre-Submission Site Allocations document, which ran in parallel to that for the master plans. Please refer to separate Report of Representations for a summary of issues raised and the Council's response.</b>		
<b>NOTE: Paragraph numbers referred to in the responses below relate to those of the September 2014 version of the master plan for LA4.</b>		
Issue	Response	Amendment required – yes or no
<b>Organisations</b>		
<i>Organisations who disagreed made the following comments:</i>		
Environment Agency:  <ul style="list-style-type: none"> <li>The site lies predominantly within a Source Protection Zone 2 (SPZ2). The groundwater is part of the Mid-Chilterns Chalk groundwater body, a Drinking Water Protected Area and groundwater Safeguard Zone which is currently classified at 'poor' status by the Thames River Basin Management Plan. Any development proposal will need to ensure that further groundwater contamination does not occur as a result of this development.</li> <li>Our surface water flood maps show that there are some surface water flooding issues around the east of the site that appear linked with flooding problems on the A416 to the NE. Any development proposal should address these issues, ensuring that flood risk is not increased on or off site and that a Greenfield runoff rate is maintained.</li> <li>The Council's Water Cycle Scoping Study 2010 concludes that waste water treatment and sewer network capacity are a possible</li> </ul>	<p><b>Change required.</b> It is helpful to note in the master plan that the site lies within a Source Protection Zone 2 (SPZ2) and the need to safeguard against any further groundwater contamination. A reference to maintaining greenfield run-off rates and ensuring that flood risk is not increased are also appropriate given flooding issues identified.</p> <p><b>No change.</b> Points of support are noted and welcomed. Other detailed points can be considered as part of assessing flooding / drainage matters.</p> <p><b>Change required.</b> With regards drainage, the Council is aware through comments on the Pre-Application Site Allocations DPD that Thames Water is often requiring technical work to be carried out by developers of some larger schemes at the planning application stage. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. Therefore, it is considered appropriate to add a short reference to the planning requirements to Policy LA4 to refer to the need for liaison with Thames Water and the potential requirement for specific technical work to be carried out to assess capacity issues. This will allow flexibility at the pre-application stage should any more specific upgrade requirements be identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues.</p> <p>For consistency, this will require related amendments to the planning requirements for LA4 to ensure early liaison with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</p>	Yes

<p>constraint to development around Berkhamsted. We are pleased that you have engaged with Thames Water on the issue and that they are happy with the proposed development.</p> <ul style="list-style-type: none"> <li>• Hertfordshire is an area of extreme water stress. Water efficiency measures such as low/dual flush toilets, low flow/aerated taps and showerheads and efficient appliances should therefore be incorporated into the housing design.</li> <li>• We are pleased that any new planting schemes will include native trees and shrubs, and that the existing informal landscaping has been recognised for its biodiversity value.</li> <li>• Opportunities should be sought through this development to tackle the known surface water flooding issues through the site, and also to give wider consideration as to how surface water flooding along the A416 could be reduced. Space will need to be allocated for this purpose around the site. A varied sustainable drainage scheme should be implemented to secure opportunities to reduce the cause and impact of flooding, e.g. using green infrastructure for flood storage. This should ensure that sufficient attenuation is provided on site.</li> <li>• Owing to the site's partial location in SPZ2, any infiltration drainage techniques will need to be carefully considered. Where infiltration systems are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater.</li> <li>• <i>a) Homes and Design Principles</i> – We support your water efficiency commitment to limit residential indoor water consumption to 105 litres per person per day.</li> <li>• <i>b) Landscape and Green Space</i> – We are pleased that the existing informal green infrastructure networks will be retained and enhanced where possible with native planting. This will ensure local wildlife does not become isolated from other green infrastructure resources.</li> <li>• It is good that sustainable drainage systems will be considered early on to ensure sufficient space for their provision, and that you intend to maximise not only flood risk but water quality and biodiversity benefits too. Whilst we strongly support the retention of the existing pond, please note that this alone is unlikely to provide sufficient attenuation for the whole site, and that other complementary drainage features will also be required.</li> <li>• <i>c) Infrastructure and Transport</i>– We are happy with the principle to link utilities to existing networks and provide extra capacity where needed to serve the development, particularly with regard to waste water infrastructure.</li> <li>• More sustainable drainage features such as swales and ponds should be allocated space and shown on the Indicative Layout.</li> </ul>	<p>The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy. However, since publishing the Pre-Submission version of the Site Allocations document the Government has confirmed a change in approach to how development schemes will be assessed. Rather than a dual system when the local planning authority consider the planning application and the SuDS Approval Body (SAB), SuDS issues will now be dealt with through conditions on planning applications, following liaison between the LPA and SAB. The Council has prepared a short guidance note to explain how the new system will be operated. A minor change is required to the text of the 'Delivery and Phasing' section of the policy to ensure references are made to the correct advisory bodies. Similar amendments will also be required to the master plan and to encourage early liaison with these bodies.</p> <p>In addition, the Council is keen to ensure delivery of a comprehensive form of development and associated works (such as foul water drainage and SUDS measures) and other contributions. This can be more difficult to achieve where a scheme is in multiple ownership, such as at LA4. The Council's expectation is that the development will initially be progressed as an application covering the site as a whole, and followed by, if required, a series of separate applications to cover each of these landownerships. The Council considers a further related update to the policy is required to cover this matter alongside changes to the master plan.</p>	
<p>Berkhamsted Residents Action Group:</p> <ul style="list-style-type: none"> <li>• BRAG remains opposed to development in the Green Belt and, while accepting that the principle has been set for this particular parcel of land, BRAG does not want to see this used as a precedent.</li> <li>• The layout and landscaping does not to create a soft edge with</li> </ul>	<p><b>No change.</b> The Council notes and welcomes the support for the level of affordable housing proposed, the preservation and planting proposals, and the development principles for the homes and design.</p> <p>With regards the principle of the proposal, the Council has taken time and care to identify what are considered, on balance, to be the most appropriate sites to bring forward for new housing. The decision to allocate the six Local Allocations for development has been taken in the context of the National Planning Policy Framework (NPPF). This requires, amongst other things, for Councils to '<i>positively seek opportunities to meet the development needs of the area</i>' (para 14); and '<i>boost significantly the supply of new housing</i>' (para 47).</p>	<p>No</p>

<p>the adjoining countryside nor secure a long term Green Belt boundary. The indicative layout places the dwellings and secondary access in the south west corner of the site in positions may facilitate road access into the adjoining Green Belt land to the south west and the playing fields on the north-west boundary. Therefore, the buildings and access should be repositioned so that buildings form a boundary to all adjoining Green Belt.</p> <ul style="list-style-type: none"> <li>• BRAG is opposed to any form of access into adjoining land which over time could be converted into access for development.</li> <li>• The reduction in new builds is too low given the capacity of the site and the pressure for new homes in the Borough.</li> <li>• The 40% Affordable element is supported by BRAG.</li> <li>• BRAG disagrees that the site is within easy walking distance of the town centre, services and rail station. At a reasonable pace the town centre is 15 - 20 minutes walking and there is a levels difference of circa 250 feet between this site and the High Street.</li> <li>• This development will generate more traffic than Herts CC assume. BRAG does not consider the signalisation of the three-way junction of Kings Road, Kingsway and Shootersway is acceptable.</li> <li>• Notwithstanding the gradients and distances involved, BRAG believes that significant improvements will have to be made to the local infrastructure in order to achieve acceptable levels of pedestrian safety. These should be fully funded by the developer.</li> <li>• BRAG strongly supports the preservation and planting proposals in 3.19 and 3.20 but continues to ask that TPOs are applied to the site now. The site is not due for development before 2021 and much can happen in the interim, including change of ownership.</li> <li>• BRAG supports the development principles for the homes and design.</li> <li>• BRAG does not consider this a suitable location for retirement/care home development, nor would such use justify removing the Green Belt designation from this land. The possibility of concentrating buildings into one block presents a future opportunity for development of remaining open space and should be resisted. (4.11)</li> <li>• BRAG supports the general approach. However, the secondary access shown on the indicative layout (fig 5) carries the risk that this access could be extended into adjoining Green Belt land on the south west and north west boundaries even though 4.27 states the internal road access is designed to prevent future expansion to adjoining land. The housing should be positioned to form a barrier to expansion.</li> <li>• On the face of it the site has ample capacity for parking, but the provision of additional tree planting and open space will take much of this and the Borough's parking standards for this site need to allow fully for residents and visitor parking to avoid overflow onto Shootersway.</li> <li>• BRAG have opposed the decision to remove this land from the Green Belt but accept that the principle has now been established providing it is not a precedent for further releases of Green Belt land for development around Berkhamsted.</li> </ul>	<p>The decisions made concerning both the overall level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The Examination was presided over by a Planning Inspector independent of the Council, who was aware of the concerns raised by local residents over the scale, location and potential impacts of new homes planned; particularly with regard to the Local Allocations. However, the Inspector's Report concludes that the Green Belt housing sites were appropriate and are required to help meet the planned level of housing and local housing needs. It is important to note that the Inspector's main concern when weighing up whether or not to find the Core Strategy 'sound' or not, was if the Council had allocated <i>sufficient</i> land for housing, not if any of the Green Belt sites should be removed from the plan.</p> <p>The principle of releasing land from the Green Belt and bringing forward this site for housing and associated uses has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered. The site is not seen as setting a precedence as future releases will need to be justified in terms of the plan-making process and against national policy on the Green Belt set out in the NPPF.</p> <p>The reduction in capacity is reasonable and necessary given more detailed work on the constraints arising from the number of trees on the site.</p> <p>The Council considers that, on balance, the site is reasonably conveniently located in terms of accessing services and facilities by means other than the car. The Council has been guided on highways / movement issues by advice of the local Highway Authority (County Council) and, having considered a variety of options, their preference is for a signalised junction. We accept that it is reasonable for the development to offset its impact on the local road network through contributing towards road improvements. This could potentially include pedestrian crossings. We would acknowledge that the details of this will need on-going liaison between the developer and County Council as the scheme is progressed.</p> <p>The Council is exploring the suitability of applying a TPO to the site with its Trees and Woodlands team.</p> <p>The site is suitable in principle for a range of residential development including a retirement / care home development. This is a residential setting and there is no fundamental reason why such a development would not be acceptable in this location in planning terms. There is also a need to secure accommodation for the growing elderly population alongside other forms of traditional housing.</p> <p>There is no overriding justification, in terms of concerns over the risk that this access could be extended into adjoining Green Belt land, to amend the indicative layout/access arrangement. There are currently no proposals to develop land adjoining the site. The Council would have to consider this if it arises through assessing future housing growth under the new Single Local Plan (see response to Grand Union investment above).</p> <p>As stated earlier, any possible release(s) will need to be justified in respect of the plan-making process and against national policy on the Green Belt set out in the NPPF. Any assessment would also need to consider and test future access arrangements with the County Council. The secondary access is only intended to serve a small cluster of homes. It is unlikely that this suggested access would be feasible to serve additional housing, especially bearing in mind the existing acknowledged sensitivities of the development on the Shootersway / Kings Road / Kinghill Way junction. Such an arrangement would have a negative impact on the proposal including introducing additional traffic through the site to the detriment of future residents, and resulting in the loss of important elements of open space and boundary landscaping.</p> <p>The aim of the master plan is to ensure ample parking is provided for the new residents and this is specifically identified as a development principle under "Infrastructure and Transport". Parking levels would need to be assessed against relevant standards applying at the time a detailed application is prepared. The Council cannot prevent residents and visitors from necessarily parking on Shootersway, although this matter could be considered as part of future traffic / parking management when the scheme is more advanced and in taking account the effects the impact of other development (i.e. Strategic Site SS1).</p>	
Facilities Manager BFI:	<b>No change.</b> The Council accepts that proposal LA4 would need to be sympathetic to the BFI site. Both Policy LA4 and the master plan provide sufficient safeguards. They both refer to the importance of the boundary with the BFI (and associated buildings) and the	No



<ul style="list-style-type: none"> <li>• The development would need to be sympathetic towards the current needs of the existing residencies, nothing too overbearing , as to damage the views, obstruct or be detrimental to the current uses of the existing dwellings, including the BFI in Kingshill Way.</li> <li>• The BFI does not wish to object to the development, as long as conditions are in place to minimise disruption with the locality and protect the boundaries of all other 'bordering' properties.</li> <li>• The impact of this development, could potentially be significant on the road use and the free movement of the additional children(since the school tier system changed) trying to cross the junction of Shootersway, Kings Road and Kingshill Way. There would need to be careful consideration given to the traffic calming and control especially at peak times.</li> <li>• Proposal SS1 - Land at Durrants Lane / Shootersway, Berkhamsted (Egerton Rothesay School). Apart from the development above, the impact will have the same but increased consequences to the roadways and pedestrian traffic at both Durrants Lane/High Street and Shootersway/Kings Road/Kingshill Way.</li> <li>• British Film Institute (BFI) is looking for general support, to continue in what they do. They currently employ c.100 people at the Berkhamsted site, many of whom are Berkhamsted residents, or live in the surrounding towns and villages, along with local contractors and suppliers, which do benefit the local economy.</li> </ul>	<p>need to protect its historical and open setting. This is to be secured through retaining and supplementing boundary planting and through care in the design and layout of new buildings. It is the intention to achieve this along the full length of the eastern boundary which already provides for significant screening.</p> <p>See responses to BRAG in relation to access and pedestrian crossing. It is acknowledged that proposal SS1 will impact on the local road network and this needs to be mitigated. This development will also need to fund a range of works, including improvements to the Shootersway / Kings Road / Kinghill Way junction.</p> <p>The Council recognises the importance of the activities of the BFI to the local economy of the town and Borough and seeks to support this role wherever possible.</p>	
<p>English Heritage:</p> <ul style="list-style-type: none"> <li>• There is a grade II listed early 19<sup>th</sup> century granary within the National Film Archive site close to The Old Orchard house. The setting of this granary has already been heavily compromised, but the residential development of this allocation should not result in further harm to its setting through increased urbanisation of its immediate setting.</li> <li>• In order to achieve that it will be necessary to retain and reinforce the trees along the eastern boundary of The Old Orchard, and for the new development fronting Shootersway (as shown on the Indicative Layout Plan in Figure 5 of the draft masterplan) to stop short of the eastern boundary so as to allow sufficient space for the new and retained tree planting.</li> </ul>	<p><b>No change.</b> See above response to this matter in connection with similar comments from the BFI.</p>	<p>No</p>
<p><i>Organisations who agreed made the following comments:</i></p>		
<p>Ecology Officer - Hertfordshire County Council:</p> <ul style="list-style-type: none"> <li>• There is a definite need for ecological compensation in the event that this site is developed.</li> <li>• a) <i>Landscape and Green Space</i> – support the soft edge to the settlement and coherent and wildlife-friendly network throughout the development that links to adjoining countryside.</li> <li>• Support the element of contributions that may be required to offset the ecological interest that will be lost.</li> <li>• Herts Ecology survey in July 2014 confirmed the grassland of the open field as being of Wildlife Site quality, following previous</li> </ul>	<p><b>No change.</b> The Council accepts that the proposal will lead to the loss of the grassland and that it would be difficult to compensate for this directly. However, the principle of the development is already firmly established through the Core Strategy and the Council is committed to its delivery. The proposal will be designed, as far as is reasonable, to promote biodiversity across the site through the retention of trees and the pond feature, reinforcing existing landscaping, and the creation of open spaces. Biodiversity offsetting is to be investigated through discussions with the County Ecologist which could help mitigate for some of the loss. This issue is explicitly referred to within the draft master plan.</p> <p><b>Change required.</b> Some changes to the master plan is justified to reflect the work of the Hertfordshire Local Nature Partnership (LNP), in partnership with the Herts and Middlesex Wildlife Trust as well as Hertfordshire County Council and the Herts Environmental Record Centre, in producing a report on Hertfordshire's Ecological Networks following a county-wide mapping project. The intention is for the mapped ecological networks to be used by local planning authorities to inform forward planning and development management decisions. This assessment of ecological networks identifies strategic priorities and which habitats need to be maintained, restored</p>	<p>Yes</p>

<p>evidence from the ecological consultant's surveys. This ecological information is new, and must be addressed to ensure sustainability issues and policies are sufficiently complied with.</p> <ul style="list-style-type: none"> <li>Landscaping and retention of habitat features in situ is acknowledged, although this will not address the grassland interest which will effectively be wholly destroyed.</li> </ul>	<p>and created based on a relative scale.</p> <p>Whilst this information should be used to inform detailed design of the site and what measures can be incorporated to meet ecological objectives, areas of predicted high priority for restoring ecological networks will not normally preclude a site from being a proposed strategic land allocation for development. The NPPF makes it clear that development should provide an appropriate net gain in biodiversity and that development can be a positive mechanism for restoring ecological networks. This level of detail relating to biodiversity enhancements and appropriate landscape and habitat designs should be set out within any planning application.</p>	
<p>HCC Highway Authority:</p> <p>The highway authority has been closely involved in the drawing up of the master plans for these sites and supports the proposals for supporting infrastructure identified therein.</p>	<p><b>No change.</b> Support noted and welcomed.</p>	<p>No</p>
<p><b>Individuals</b></p>		
<p><i>Individuals who disagreed made the following comments:</i></p>		
<ul style="list-style-type: none"> <li>"Limit buildings to 2 storeys normally" should be amended to read "The buildings will be limited to 2 storeys" to be compatible with the existing environment.</li> <li>Having any buildings above 2 storeys is not acceptable, especially for the dwellings visible from the road, since it forms the skyline. The houses on the Old Orchard site that will be visible on Shootersway and face the traffic coming up Kings Road should be medium/low density housing not mansion flats.</li> <li>The LA4 local allocation should respect its ridge top location.</li> <li>There should be an analysis of the current traffic problems at the Shootersway/Kings Road junction so that we can understand the effect of this development. The traffic volumes have increased significantly since the last assessment of the Shootersway/Kings Road based on a survey carried out in 2009 and 2010.</li> <li>The addition of 40 more dwellings on the south side of Shootersway will have an effect because they will have to cross accelerating traffic turning into Shootersway and try to join a stationary queue of traffic on the north side of the road. Most of the traffic chaos is caused by school traffic travelling towards the Kings Road.</li> </ul>	<p><b>No change.</b> The Council acknowledges the importance of new development being sensitive to this ridge top location. However, limiting buildings to only two storeys would be too restrictive. Modern developments often consist of a mix of types and styles of properties. The site is well screened and the Council does not want to be overly prescriptive regarding design guidance in order not to stifle innovation. For example, the presence of a small number of slightly taller buildings could provide for focal points or landmark buildings within the development. The type and height of buildings would still need to be justified in terms of the local character.</p> <p>Larger properties are a common feature of Shootersway. In principle, such buildings as part of the new development could be acceptable on the Shootersway frontage subject to careful design, layout and landscaping.</p> <p>There is a good understanding of associated highway matters. The Council has taken into account the results of the Highway Authority's feasibility study into the Shootersway / Kings Road / Kinghill Way junction and other advice regarding highway issues. This advice is reflected in the planning requirements for the site and in the Schedule of Transport Proposals, and where necessary elaborated in the site master plan. Site LA4 currently has a Highway Statement which has been agreed with the Highway Authority. Detailed highway issues will be considered as part of the planning application process, for which the Highway Authority are statutory consultees. They are content with the arrangements (see their comments above). Appropriate highway improvements and mitigation measures will be secured through developer contributions and agreements.</p>	<p>No</p>
<p><b>Landowners</b></p>		
<p><i>Landowners who disagreed made the following comments:</i></p>		
<p>Grand Union Investment:</p> <ul style="list-style-type: none"> <li>It should be noted that LA4 was allocated within the Core Strategy (September 2013) prior to the publication of the Sinclair Knight Merz (SKM) Green Belt Review Purposes Assessment (November 2013) prepared as part of DBC's Early Partial Review (EPR) evidence base, which supports the allocation of LA4. LA4 is situated within a much wider parcel, "GB11", and "Strategic Sub-Area D-S2".</li> <li>Support the unit reduction from 60 dwelling. However, this unit</li> </ul>	<p><b>No change required.</b> Support for reduction in capacity noted.</p> <p>The reduction in capacity is not so marked locally nor will it have a significant impact on the delivery of the housing programme as a whole, as to warrant the identification of a new allocation(s). The housing programme is not solely reliant on allocations and it is likely that any shortfall can readily be made up over the plan period e.g. through new housing commitments in the town. Current housing supply is healthy.</p> <p>The site off Chesham Road is too small to be identified as an allocation. Once a satisfactory scheme is prepared the land in principle could readily come forward through the Development Management process.</p>	<p>No</p>

<p>reduction results in a shortfall of 20 units not being allocated in the Site Allocations DPD to meet the local needs of Berkhamsted.</p> <ul style="list-style-type: none"> <li>• This shortfall should be re-addressed within the local area to help contribute towards meeting the local and specific housing needs of Berkhamsted. The first option is to extend the boundary of LA4 to include adjoining land in GUI's ownership. Alternatively, land should be allocated off Chesham Road (DBC Schedule of Site Appraisals (September 2014) site Be/h2f) and is currently being promoted under this Site Allocations process as a housing allocation. Whilst the site is between 5 to 8 units, it would help to make up the shortfall.</li> <li>• <i>b) Landscape and Green Space</i> – Strengthening of existing landscaping as part of the LA4 development should not be used to seek to prevent the development potential of neighbouring land i.e. the land identified at Figure 1. The wording of the draft LA4 Masterplan should not seek to prevent development on adjacent land.</li> <li>• Accordingly, the following text should be deleted from the draft LA4 Masterplan: <ul style="list-style-type: none"> <li>• "Create a defensible boundary to the Green Belt and new soft edge to the settlement by enhancing and managing existing landscaping and through careful design and layout.</li> <li>• Strengthen the boundary to prevent outward expansion of the Green Belt at the western boundary."</li> </ul> </li> <li>• <i>c) Infrastructure and Transport</i> – These representations do not wish to comment in detail on the 'Infrastructure and Transport' section, however GUI strongly object to the last point which states that the design of the internal road access should: <i>"prevent future expansion of the development into adjoining land."</i></li> <li>• The area has been identified by SKM as one of three strategic sub areas within Dacorum that contribute the least towards the purposes of the Green Belt. Accordingly, the following text should be deleted from the draft LA4 Masterplan: <i>"Design internal road access to prevent future expansion of the development into adjoining land (e.g. into the adjoining Haslam Field)."</i></li> <li>• These representations should be read in conjunction with the response submitted on behalf of GUI to DBC's Site Allocations Consultation Document (September 2014) in November 2014.</li> </ul>	<p>There is no overriding justification to expand the site into adjoining land in the Green Belt to address the reduced housing capacity and its impact on local housing. Additional changes to the Green Belt cannot be supported through the Site Allocations DPD. The strategic context for the Green Belt is provided by the Core Strategy and the Site Allocations DPD must have regards to this. Therefore, the principle of releasing land from the Green Belt (i.e. the local allocations) has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set or additional Green Belt releases to meet specific development needs (see Core Strategy para. 8.29), but to demonstrate how this will be delivered. This is a matter that can be reasonably dealt with in considering future housing growth through taking forward the new Single Local Plan (incorporating the partial review of the Core Strategy) and in the light of associated technical work.</p> <p>The development currently does not form part of any future proposals to expand into the surrounding Green Belt. Therefore, it is sensible that the Council reflects this in the planning requirements / development principles for LA4. Any possible release(s) adjoining LA4, if it comes forward, will need to be justified in respect of the plan-making process and against national policy on the Green Belt set out in the NPPF. Any assessment would also need to consider and test future access arrangements. The proposed access arrangement is only intended to serve a modest number of homes. It is unlikely that this suggested access would be feasible to serve additional housing, especially bearing in mind the existing acknowledged sensitivities of the development on the Shootersway / Kings Road / Kinghill Way junction.</p>	
<p>Landowners who agreed made the following comments:</p>		
<p>-</p>		

**ISSUE: Master Plan: Local Allocation LA5**

**Number of people/organisations responding 130**

**Supporting -**

Key organisations	7
Individuals	8
Landowners	0
<b>Total</b>	<b>15</b>

**Objecting -**

Key organisations	6
Individuals	117
Landowners	1
<b>Total</b>	<b>124</b>

**N.B Some of the organisations and individuals put forward comments both of support and objection, so they are included in the tally once for each support and object**

**NOTE. Some local residents wishing to raise concerns regarding the LA5 development did so by responding to the consultation on Policy LA5 of the Pre-Submission Site Allocations document, which ran in parallel to that for the master plans. Please refer to separate Report of Representations for a summary of issues raised and the Council's response.**

**NOTE: Paragraph numbers referred to in the responses below relate to those of the September 2014 version of the master plan for LA5.**

Issue	Response	Amendment required – yes or no
<b>Organisations</b>		
<i>Organisations who disagreed made the following comments:</i>		
<p>Impact on Chilterns Area of Outstanding Natural Beauty (AONB) and countryside</p> <ul style="list-style-type: none"> <li>No recognition given to the impact on the Chilterns Area of Outstanding Natural Beauty (AONB) which is a national landscape designation where development is proposed. Development should be limited to ensure its scale and form conserves the openness of the AONB</li> <li>Object to the proposed playing fields, children's play area, Gypsy site and cemetery extension in the AONB. These proposals would neither conserve nor enhance the AONB and are contrary to the Council's assurances prior to the Core Strategy public examination (document SG9). Such facilities should be placed within the development area or at an alternative location. There appears to be no evidence that the western fields is the only possible site around Tring for these facilities.</li> </ul>	<p><b>No change.</b> The LA5 development will not significantly harm the special qualities of the AONB, so will comply with Core Strategy Policy CS24. This conclusion reflects the Key Development Principles for LA5 in Site Allocations Policy LA5 (especially principles 3, 5-7, 10, 11, 13 and 14) and the more detailed guidance in the LA5 Draft Master Plan.</p> <p><b>No change.</b> The LA5 proposals will not significantly harm the special qualities of the AONB, as explained below:</p> <ul style="list-style-type: none"> <li>Public open space: the proposed public open space has the potential to considerably enhance the AONB. The section on 'Landscape' on pages 36-39 of the Draft Master Plan, shows that the proposals for the open space will include the retention of existing trees, the retention and enhancement of existing hedgerows, additional tree planting of native species and the creation of new wildlife habitats. Objections to the possibility of playing pitches being included in the western fields public open space are considered below under 'Green space'.</li> <li>Children's play area: a location in the western fields is proposed in order to minimise disturbance to residents in the new housing. The play area would not cause significant harm to the special qualities of the AONB, as paragraph 5.40 states that it should be designed creatively to fit in with the AONB and that brightly coloured metal equipment should be avoided. Also, it will be relatively small (about 0.1 hectares, or only 1.5% of the proposed western fields public open space).</li> <li>Cemetery extension: a location in the western fields is proposed in order to meet long term needs in the Tring area (see paragraphs 5.51-5.53). It is considered that the cemetery extension will enhance the AONB.</li> </ul>	<p>No</p> <p>No</p>

<ul style="list-style-type: none"> <li>Development should be limited to ensure its scale and form conserves the wider landscape into the Vale of Aylesbury.</li> </ul>	<p>Paragraph 5.55 stresses that great importance is attached to creating a green cemetery that blends harmoniously into the countryside. This paragraph also explains how this will be achieved.</p> <ul style="list-style-type: none"> <li>Gypsy and Traveller site: a location in the western fields is proposed for the reasons stated in paragraph 5.12 of the master plan. Paragraph 5.13 explains why the site will have a limited impact on the special qualities of the AONB. It is proposed to amend the Draft Master Plan to add further detail about the screening/landscaping of the site and refer to the small size of the site (see below under 'other points about the Gypsy and Traveller site' in the assessment of objections from individuals). Further information relating to the choice of this location is set out in the Housing and Community Services Background Issues Paper (September 2015).</li> </ul> <p>See below for further consideration of the impact of the different elements of the LA5 proposals on the AONB.</p> <p><b>No change:</b> It is considered that the LA5 development will not have a significant impact on the Vale of Aylesbury. Many of the development principles set out in the master plan (and associated Site Allocations DPD) are intended to ensure the visual impact of LA5 is appropriately mitigated.</p>	No
<p>Figures</p> <ul style="list-style-type: none"> <li>Figures 2, 4, 6, 7 and 9 do not show the Chilterns AONB (and it is unclear on Figure 5), and therefore the implications of the development on the AONB are not clear.</li> </ul>	<p><b>No change.</b> The AONB is clearly shown on Figure 8 (Constraints and Opportunities Plan). It is not considered necessary to amend Figure 5 or show the AONB on Figures 2, 4, 6, 7 or 9.</p>	No
<p>The site and its surroundings (pages 7-10)</p> <ul style="list-style-type: none"> <li>Reference should be made to the Tring Woodlands Site of Special Scientific Interest, which is also a Special Area of Conservation known as Chilterns Beechwoods.</li> <li>The site lies above the Chiltern Chalk Scarp groundwater body (a Drinking Water Protected Area). This groundwater should be protected from pollution, including from the proposed cemetery extension.</li> </ul>	<p><b>No change.</b> Paragraphs 2.18 and 2.19 provide only a brief overview of the location of LA5, so it is not considered necessary to refer to the Chilterns Beechwoods. The location and importance of this area is already clearly referred to in the Core Strategy and Site Allocations DPDs, which this master plan supports.</p> <p><b>Change required.</b> It is agreed that a reference to the Chiltern Chalk Scarp groundwater body is appropriate to add to the 'Constraints' section.</p>	No Yes
<p>Section 4: Development constraints and opportunities (pages 23-26)</p> <ul style="list-style-type: none"> <li>Object to the failure to treat the AONB as a major constraint.</li> <li>Bullet 2 on page 26: The creation of new recreational space and community facilities in the AONB should not be regarded as an opportunity. Object to the lack of detail regarding community facilities and the likely impact on the AONB.</li> <li>Bullet 4 on page 26: In the text about small areas of open space being designed around the existing clumps of trees, the word 'could' should be replaced with 'should'.</li> </ul>	<p><b>Change required.</b> Whilst bullet points 2 and 3 under 'Constraints' on page 25 relate to the AONB, it is agreed that an additional bullet should be added to refer to the fact that the western part of LA5 is within the AONB.</p> <p><b>No change.</b> It is considered that the creation of new recreational space and community facilities in the AONB is an opportunity. This part of the Draft Master Plan (which simply deals with constraints and opportunities) is not the appropriate place to go into detail about the community facilities.</p> <p><b>No change.</b> This part of the Master Plan is simply setting out the opportunities, not making proposals or setting out requirements. Therefore, the word 'could' is appropriate.</p>	Yes No No
<p>Vision (page 27)</p> <ul style="list-style-type: none"> <li>The Vision should refer to the 'conservation and enhancement of the natural beauty of the Chilterns AONB'.</li> </ul>	<p><b>No change.</b> The vision already contains three references to the Chilterns and it is not considered that any further references are necessary. The objectives of the AONB are already set out in the Core Strategy Policy CS24: The Chilterns Area of Outstanding Natural Beauty, with which all new development is expected to comply.</p>	No





<ul style="list-style-type: none"> <li>Paragraph 5.12: Object to the proposed Gypsy site, as the location in the AONB is contrary to Government guidance. Disagree that the Gypsy site would have only a limited impact on the AONB.</li> <li>Paragraph 5.17: It appears that the main reason for locating the Gypsy site away from the development area is that CALA Homes does not support its inclusion in the proposal.</li> <li>The Core Strategy does not require a Gypsy site on LA5, so the proposal is contrary to Core Strategy Policies CS5 and CS24.</li> <li>Object to the lack of conformity between the draft masterplan and Core Strategy Hearing Statement on Issue 7 on the matter of integrating the Gypsy site with the settled community (i.e. the rest of the town).</li> </ul>	<ul style="list-style-type: none"> <li>To comply with Government guidance in paragraph 15 of 'Planning policy for traveller sites', which allows local planning authorities to alter Green Belt boundaries to meet a specific identified need for a traveller site if exceptional circumstances exist. It should be noted that the Government's consultation on 'Planning and travellers' (September 2014) does not propose any changes to paragraph 15 of the existing guidance.</li> </ul> <p>To ensure that all the uses proposed at LA5 that are inappropriate in the Green Belt (i.e. housing, employment development, cemetery extension and Gypsy and Traveller site) are excluded from the Green Belt, whilst the proposed public open space in the Western Fields remains in the Green Belt</p> <p><b>No change.</b> The Gypsy and Traveller site would have a limited impact on the AONB, but this would be mitigated by the proposed screening. Also, the overall proposals for LA5 will not harm the special qualities of the AONB (see response to objections regarding the impact on the AONB above). Therefore, it is considered that the proposal is consistent with paragraph 115 in the National Planning Policy Framework.</p> <p><b>No change.</b> The main reasons for selecting the proposed location are set out in paragraph 5.12 in the Draft Master Plan.</p> <p><b>No change.</b> A brief summary of the process the Council has been through with regard to considering and assessing potential Gypsy and Traveller sites is set out in the Issues Paper the Council prepared for the Core Strategy Examination: <a href="http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement---dacorum-borough-council.pdf?Status=Master&amp;sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement---dacorum-borough-council.pdf?Status=Master&amp;sfvrsn=0</a>. This clearly explained to the Inspector the Council's proposed approach of setting strategic policies (plus a monitoring target for new pitch provision) through the Core Strategy and identifying precise pitch locations and requirements on the three largest Local Allocations (LA1, LA3 and LA5) through the Site Allocations. The specialist consultants who prepared the Council's latest Traveller needs Assessment (ORS) stated that the incorporation of new sites within new urban extensions was emerging as a 'good practice' approach.</p> <p><b>No change.</b> It is not accepted that the site would be poorly integrated with the settled community – indeed, Hertfordshire County Council's Gypsy Unit Manager and an existing resident living on the Long Marston Gypsy site support the proposed location.</p> <p><i>Note: Legal advice is currently being sought on the implications of the Government's recent changes to the definition of Gypsies and Travellers in the Gypsy and Traveller Policy Statement. If any changes are required to the number or location of new pitches, this will be considered via the Report of Representation on the Pre-Submission Site Allocations Focused Changes. Any consequential changes needed to the master plans for consistency will be made via delegated authority.</i></p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p>
<p>Employment area extension (page 30)</p> <ul style="list-style-type: none"> <li>A larger employment allocation should be made to make it worthwhile.</li> </ul>	<p><b>No change.</b> Paragraph 4.51 in the SW Hertfordshire Employment Land Update (Roger Tym &amp; Partners, June 2010) advised the Council that:</p> <p><i>"Icknield Way should be protected and may be expanded to cater for businesses relocating from the other sites in the town and inward investors. We have not reviewed the quantum of space required but there is a natural extension of approximately 2.6 hectares by extending the rear boundary in a straight line up to the boundary with the AONB and to the Icknield Way frontage."</i></p> <p>Whilst there is a need for some land to meet future needs for B-class employment floorspace in Tring, there is also a clear need to provide more housing land. It is considered that the size of the proposed employment area extension (0.75 hectares) represents an appropriate balance between housing and employment development on LA5. Any additional employment land needed for the town will be considered through the new Local Plan process</p>	<p>No</p>
<p>Design (pages 31-33)</p> <ul style="list-style-type: none"> <li>Paragraph 5.27: High quality attractive design should be applied throughout the site to reflect the impact of the development on the setting of the AONB.</li> <li>There is not enough green space within the proposed housing</li> </ul>	<p><b>No change.</b> Paragraph 5.27 already provides appropriate guidance, including reference to the Chilterns Buildings Design Guide.</p>	<p>No</p>

<p>development.</p> <ul style="list-style-type: none"> <li>Concern about light pollution.</li> <li>Water efficiency measures should be incorporated into the housing design, in line with Core Strategy Policy CS29.</li> </ul>	<p><b>No change.</b> The housing area will include areas of open space and will be well landscaped - see in particular paragraphs 5.23, 5.26, 5.37 and 5.46-5.49.</p> <p><b>No change.</b> Paragraph 5.29 provides appropriate guidance. Light pollution is also controlled by Core Strategy Policy CS32: Air, Soil and Water Quality.</p> <p><b>No change –</b> The developer will be required to demonstrate compliance with Core Strategy Policy CS29 (specifically part (b) in regard to the consumption of water resources during construction and part (e) to limit residential water consumption to 105 litres per person per day). In doing so they will be expected to submit a Sustainability Statement and carbon compliance checklist in support of any planning application for the development of LA2 (paragraph 18.22 of the Core Strategy). This will be assessed at the planning application stage and the Environment Agency will be consulted during that process. Additionally, details regarding the implementation of home-specific water efficiency measures will be the subject of regulations outside of the town and country planning remit. Specifically, following withdrawal of the Code for Sustainable Homes, the developer will be required to demonstrate compliance with the Building Regulations 1984 (as amended) which now includes a need to ensure the provisions for renewable energy, water efficiency measures and off-site carbon abatement measures for developments of 10 units or more (as inserted following enactment of the Infrastructure Act 2015).</p>	<p>No</p> <p>No</p> <p>No</p>
<p>Green space (pages 34 &amp; 35)</p> <ul style="list-style-type: none"> <li>The development principles do not comply with NPPF paragraph 89, which states that outdoor sports, outdoor recreation and cemeteries are appropriate <i>‘as long as it conserves the openness of the Green Belt and does not conflict with the purposes of including land within it.’</i></li> <li>A development principle should state there <i>‘will not be any external lighting, solid boundary treatments or buildings in the western fields.’</i></li> <li>Object to the proposed playing fields and children’s play area in the AONB, contrary to Local Plan Policy 97. Also, there will inevitably be proposals for changing rooms, toilets and parking. Playing fields and a play area are inconsistent with the AONB and the location is remote from housing, so the play area is unlikely to be used. They should be placed within the development area or at an alternative location.</li> <li>The western fields should be used only for informal open space or agriculture.</li> </ul>	<p><b>No change.</b> Paragraph 89 in the NPPF relates to buildings, not open uses of land. The section on ‘Green Space Principles’ in the Draft Master Plan does not propose any buildings. Instead, it proposes open uses which are consistent with NPPF Paragraph 81. This paragraph states that local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide for outdoor sport and recreation, amongst other things.</p> <p><b>Change required.</b> Paragraph 5.36 already states that artificial lighting in the western fields should be avoided. This paragraph should be amended so that this also applies to walls and solid fences. The Draft Master Plan should also say that any building required to serve the possible playing fields should be small-scale and unobtrusive.</p> <p><b>Change required.</b> Key Development Principle 13 for LA5 in the Site Allocations document does not propose playing pitches, but simply says they should be considered. Paragraph 5.35 in the Draft Master Plan states that the Council’s preference is for the western fields to provide a mix of parkland and open space, but refers to the possibility of playing pitches.</p> <p>There is a need for some flexibility over the location of new pitches in Tring, as set out in Dacorum’s Playing Pitch Strategy and associated Action Plan. Therefore, the possibility of providing playing pitches in the western fields should be retained. However, a large complex of playing pitches would harm the special qualities of the Chilterns AONB, as substantial changing rooms and car parking and possibly floodlighting would be required. These limitations are recognised within the Action Plan. Therefore, Green Space principle 1 and paragraph 5.35 should be amended to make it clear that playing fields are acceptable only on part of the western fields open space. The Draft Master Plan should also say that any building and car parking to serve the possible playing fields should be small-scale and unobtrusive.</p> <p>Paragraph 5.40 already states that the children’s play area should be designed creatively to fit in with the AONB and that standard brightly coloured metal equipment should be avoided.</p> <p><b>No change.</b> Paragraph 5.35 already indicates that the Council’s preference is for the western fields to provide a mix of parkland and open space, but refers to the possibility of playing pitches. Retaining the land in agricultural use would represent a missed opportunity to enhance the site from a visual, recreational and wildlife perspective.</p>	<p>No</p> <p>Yes</p> <p>Yes</p> <p>No</p>
<p>Landscape (pages 36-39)</p> <ul style="list-style-type: none"> <li>The landscape principles should take account of the impact on the</li> </ul>	<p><b>No change.</b> Landscape principles 1 and 2 already refer to the AONB, whilst the supporting text also refers to the Chilterns and puts forward suggestions for enhancing the landscape.</p>	<p>No</p>





<p>attenuation/greenfield runoff. There is great scope for a varied sustainable drainage scheme with features such as swales and ponds, in line with Core Strategy Policy CS31.</p>	<p>intention was that the local planning authority would consider the planning application, whilst SuDS issues would be dealt with by the SuDS Approval Body (SAB). However, SuDS issues will now be dealt with through conditions on planning applications, following liaison between the LPA and SAB. The Council has prepared a short guidance note to explain how the new system will be operated. A minor change is required to paragraph 5.58 to reflect this. A similar amendment has been proposed to Site Allocations Policy LA5.</p>	
<p>Section 6: Concept masterplan (Pages 45-47)</p> <ul style="list-style-type: none"> <li>Object to those elements of the proposal within the AONB.</li> <li>The layout should include the AONB and its boundary.</li> </ul>	<p><b>No change.</b> See above for consideration of the impact of the LA5 proposals on the AONB.</p> <p><b>No change.</b> The AONB is shown on Figure 8 (constraints and opportunities plan) and it is not considered necessary to also show it on Figure 9. The focus of Figure 9 is the layout of the development, not planning and landscape designations.</p>	<p>No</p> <p>No</p>
<p>Section 7: Delivery (pages 49 &amp; 50)</p> <ul style="list-style-type: none"> <li>Object to this section, because of the proposed development (playing fields, children's play area, Gypsy site and cemetery extension) in the AONB.</li> <li>Paragraph 7.6: Object as community indoor sports facilities are not included as an item to be funded through a Section 106 agreement or CIL. Funding is justified given Core Strategy Policy CS23, the evidence in the Council's Sports Facility Audit (2011) and NPPF paragraph 73.</li> </ul>	<p><b>No change.</b> See above for consideration of the impact of the different elements of the LA5 proposals on the AONB.</p> <p><b>Change required.</b> Community indoor sport facilities have not been specifically identified in the delivery section (Chapter 6) of the master plan as at this early stage it is not known exactly what facilities will be required and how they will be managed. The priority is to deliver outdoor facilities, but small-scale indoor facilities could be considered subject to delivering other priority infrastructure identified in the master plan, its impact on the viability and delivery of the scheme as a whole, and the availability of other funding streams. Off-site facilities would be more difficult to fund. It should be noted that the development will provide for significant opportunities for play space. It will also need to fund a wide range of other key facilities and infrastructure.</p> <p>The Council have recently completed an Outdoor Leisure Facilities Playing Pitch Strategy and Action Plan following completion of an assessment report in September 2014. This document will provide a platform for the Council as a whole to direct investment for social and community infrastructure improvements/provisions and to also inform the New Local Plan which could identify the provision of new facilities where they are evidently required. However, the current wording of the Council's Regulation 123 list does not allow S106 Agreements to be entered into for the provision of indoor sports and leisure facilities or for outdoor sports pitches, as these are types of infrastructure that might be funded through CIL. The funding regime is often subject to change, but in theory the Community Infrastructure Levy (CIL) collected from this and other development sites in the Borough could contribute towards future off-site sport facilities. It is reasonable to consider whether there is scope to consider such funding in negotiating the S106 at the planning application stage. However, this would similarly be subject to delivering other priority infrastructure identified in the master plan and its impact on the viability of the scheme. Any S106 agreement would need to comply with the Council's Regulation 123 list that sets out which types of infrastructure may be funded through CIL, and hence not S106.</p> <p>A bullet point will be added to paragraph 7.6 of the master plan is proposed to reflect the potential for the development to contribute to the provision of social and community facilities, which could include outdoor and/or indoor sports facilities.</p>	<p>No</p> <p>Yes</p>
<p><i>Organisations who agreed made the following comments:</i></p>		
<ul style="list-style-type: none"> <li>Support the principle of development.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	<p>No</p>
<ul style="list-style-type: none"> <li>The graduated approach (east-west across the site) minimises impact on the AONB.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	<p>No</p>
<ul style="list-style-type: none"> <li>Phasing of development should reflect infrastructure provision.</li> </ul>	<p><b>No change.</b> Noted. This will be achieved through section 7 (Delivery) in the Draft Master Plan. The delivery of infrastructure will also be controlled through the application of Core Strategy Policy CS35: Infrastructure and Developer Contributions.</p>	<p>No</p>
<p>Sections 2 Context and 3 Analysis of the Site (pages 3-22)</p>	<p><b>No change.</b> Noted. Sections 2 and 3 do consider the site within its wider context.</p>	<p>No</p>

<ul style="list-style-type: none"> <li>Support these sections, but would emphasise how these relate to the whole of Tring, as shown by the consultation findings on the Town Council's Community Plan for Tring.</li> </ul>		
<p>Landscape and visual impact (pages 13-16)</p> <ul style="list-style-type: none"> <li>Trees on the northern side of the site should go no higher than the (two storey) ridgeline.</li> <li>Poplars are recommended for screening on the south side.</li> <li>Paragraph 3.13: The biodiversity potential of the chalky roadside verges at the A41 roundabout should be recognised.</li> </ul>	<p><b>No change.</b> Noted. The type of trees to be planted is a detailed issue to be considered at the planning application stage.</p> <p><b>No change.</b> Noted. The type of trees to be planted is a detailed issue to be considered at the planning application stage.</p> <p><b>No change.</b> Noted. This is an issue which should be considered at the planning application stage, when the landscape strategy is developed further (see Draft Master Plan paragraph 3.12).</p>	<p>No</p> <p>No</p> <p>No</p>
<p>Highways and access (pages 17-20)</p> <ul style="list-style-type: none"> <li>The highway authority (Hertfordshire County Council) has been closely involved in the master plan and supports its infrastructure proposals.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	<p>No</p>
<p>Infrastructure, services and utilities (pages 20-22)</p> <ul style="list-style-type: none"> <li>Paragraph 3.24: Support the recognition that waste water treatment and sewerage network capacity may need upgrading to cope with development around Tring, including to serve LA5.</li> <li>Paragraph 3.26: School expansions should minimise use of temporary classrooms and the number of children not getting the school of first preference.</li> <li>Paragraph 3.27: Assurances that GP surgeries have adequate capacity need to be confirmed.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Noted. This is not a matter for consideration through the Master Plan, but rather a schools planning matter for Hertfordshire County Council.</p> <p><b>No change.</b> Noted. Officers from the Borough Council have met representatives of the Herts Valleys Clinical Commissioning Group as part of work to update the Infrastructure Delivery Plan (InDP). They have confirmed that they do not anticipate any capacity problems in the foreseeable future given known developments in Tring, including LA5. This information is included in the InDP 2015.</p>	<p>No</p> <p>No</p> <p>No</p>
<p>Section 4: Development constraints and opportunities (pages 23-26)</p> <ul style="list-style-type: none"> <li>Support bullet 6 under 'constraints' about protecting and enhancing existing trees and hedgerows.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	<p>No</p>
<p>Opportunities (pages 25 &amp; 26)</p> <ul style="list-style-type: none"> <li>Bullet 3 on page 26: the management of the western fields open space needs careful management, given its role as a rural gateway to a market town.</li> </ul>	<p><b>No change.</b> Noted.</p>	<p>No</p>
<p>Vision (page 27)</p> <ul style="list-style-type: none"> <li>Support the vision, but successful implementation requires integration with the rest of the town, sensitive development given the prominent gateway location and provision of the necessary infrastructure (e.g. school places, health facilities and highway improvements (vehicular, cycling, pedestrian)).</li> </ul>	<p><b>No change.</b> Noted. Sections 2 and 3 of the master plan do consider the site within its wider context.</p>	<p>No</p>

<p>Homes (pages 28 &amp; 29)</p> <ul style="list-style-type: none"> <li>Paragraph 5.6: Support the high proportion of affordable housing.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	<p>No</p>
<p>Design (pages 31 &amp; 32)</p> <ul style="list-style-type: none"> <li>The design should reflect Tring's character, but should not be 'mock' Rothschild.</li> <li>Paragraph 5.31: Support for high sustainability standards (Tring is a transition town). This should include water efficiency measures, in line with Core Strategy Policy CS29. The aim should be to achieve 105 litres per head per day.</li> </ul>	<p><b>No change.</b> Noted. The detailed design on the dwellings is a matter for the planning application stage and will be expected to comply with appropriate design policies within the Core Strategy. Appropriate guidance on expectations is set out in the 'Design Principles.'</p> <p><b>No change.</b> Noted. Paragraphs 5.31 and 5.32 provide appropriate guidance. The requirements of Core Strategy Policy CS29: Sustainable Design and Construction should be met.</p>	<p>No</p> <p>No</p>
<p>Green space and landscape (pages 34-39)</p> <ul style="list-style-type: none"> <li>Support proposed new habitat creation, recognition of biodiversity/habitat potential of drainage solutions, native planting schemes and the enhancement of green infrastructure networks.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	<p>No</p>
<p>Green space (pages 34 &amp; 35)</p> <ul style="list-style-type: none"> <li>No objection to principle of sports / recreational uses in the western fields, but would prefer all land in the AONB to remain as fields.</li> <li>Support the proposed public open spaces and green corridors – should include some informal spaces e.g. wild buffer zones along main hedgerows and surface water drainage features.</li> <li>The possible use of the western fields for playing pitches is welcomed as this may be an appropriate strategy solution for addressing current and future playing pitch needs in the Tring area (depending on the conclusions of the Outdoor Leisure Facilities Assessment Action Plan).</li> <li>The Outdoor Leisure Facilities Assessment Action Plan should consider whether the shape and size of the western fields are suitable for playing pitches.</li> <li>If the western fields are used for football pitches, there should be at least two pitches to ensure efficient and sustainable management.</li> <li>If pitches are proposed, a sports turf consultant's (agronomist) feasibility study is needed to secure suitable quality playing fields.</li> <li>If pitches are proposed, ancillary facilities such as changing rooms, maintenance/equipment storage building and car parking will be required.</li> </ul>	<p><b>No change.</b> Noted. See above for consideration of the impact of the sports/recreational uses on the AONB.</p> <p><b>No change.</b> Noted. Paragraph 5.45 already provides appropriate guidance.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Noted. The Outdoor Leisure Facilities Assessment Action Plan has identified a deficiency in playing pitch provision in Tring, but has not considered whether the western fields are a suitable location to meet this deficiency. See also response above.</p> <p><b>No change.</b> Noted. If any pitches are provided it is envisaged that there would be two pitches, but as stated above the Draft Master Plan should be amended to state that a large complex of playing pitches would harm the special qualities of the Chilterns AONB (see consideration of objection to playing fields and children's play area in the AONB).</p> <p><b>No change.</b> Noted. This is a detailed point, which should be considered at the implementation stage if it is decided to include any pitches on the site.</p> <p><b>No change.</b> Noted, but as stated above the Draft Master Plan should be amended to say that any building and car parking to serve the possible playing fields should be small-scale and unobtrusive (see consideration of objection to playing fields and children's play</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>

<ul style="list-style-type: none"> <li>• Site management should be considered at an early stage, to ensure there are local bodies that could manage a community playing field.</li> <li>• Informal open space has significantly greater biodiversity potential than formal playing pitches. Creation of a wildflower meadow could also be considered to reflect the area's ecological, grazing and farming heritage.</li> </ul>	<p>area in the AONB).</p> <p><b>No change.</b> Noted. The eventual ownership and management of the any playing fields will be considered at the implementation stage if it is decided to include any pitches on the site.</p> <p><b>No change.</b> Noted. Paragraph 5.45 already provides sufficient guidance.</p>	<p>No</p> <p>No</p>
<p>Landscape (pages 36-39)</p> <ul style="list-style-type: none"> <li>• Support retention of hedgerows and tree belts, and new native tree planting and wildlife habitats in the western fields.</li> <li>• Support the landscape principles, but screen planting should not become dominant or enclosing.</li> <li>• Support development principle 1 on limiting the effect of new building on views from the AONB, but <i>'and enhance the background view of Tring from the AONB.'</i> Given the visibility of LA5 from the elevated public vantage points on public rights of way near Dancer's End.</li> <li>• Area's Gateway role should reflect the local character of the AONB.</li> <li>• Paragraph 5.44: Planting on the Aylesbury Road verge should not limit its potential as a chalk grassland strip.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Noted. Paragraphs 5.43 and 5.44 already recognise that screen planting should not become dominant or enclosing.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Noted – see paragraph 5.44.</p> <p><b>No change.</b> Noted. This should be considered further at the planning application stage, once CALA homes have carried out further studies on ecology and landscape issues.</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>
<p>Cemetery extension (pages 39-40)</p> <ul style="list-style-type: none"> <li>• Support the cemetery extension.</li> <li>• Extending the existing cemetery would be preferable, but the detached extension is accepted to secure a long-term solution, including space for natural burials.</li> <li>• No objection to the cemetery extension in principle, but would prefer a 'green burial ground' to soften the impact on the Green Belt and AONB. Another development principle is required to ensure this happens.</li> <li>• The 'green' cemetery will enhance the AONB.</li> <li>• Management as wildflower meadow would necessitate the cutting and lifting of grass at appropriate times to achieve ecological benefits.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Noted.</p> <p><b>No change.</b> Noted. Paragraph 5.55 already provides sufficient guidance.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Noted. This is a detailed management point.</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>

<ul style="list-style-type: none"> <li>Satisfied that the potential pollution risk to groundwater from cemeteries is recognised and that surveys will be carried out.</li> </ul>	<b>No change.</b> Support noted and welcomed.	No
Utilities and services (page 41)		
<ul style="list-style-type: none"> <li>Paragraph 5.58: Support the proposed incorporation of surface water drainage into the open spaces and that a range of drainage features will be used.</li> </ul>	<b>No change.</b> Support noted and welcomed.	No
<ul style="list-style-type: none"> <li>Satisfied that extra utility capacity, particularly foul drainage, will be provided to serve the development.</li> </ul>	<b>No change.</b> Support noted and welcomed.	No
Highways and access (pages 41-43)		
<ul style="list-style-type: none"> <li>The highway authority (Hertfordshire county Council) has been closely involved in the master plan and supports its infrastructure proposals.</li> </ul>	<b>No change.</b> Support noted and welcomed.	No
<ul style="list-style-type: none"> <li>Measures are needed to minimise the use of private cars and ensure safety of pedestrians and horse riders.</li> </ul>	<b>No change.</b> Noted. Transport issues will be looked at in more detail through the Transport Assessment at the planning application stage (see paragraph 5.64).	No
<ul style="list-style-type: none"> <li>Paragraph 5.62: Support decision to have no access to LA5 from adjoining residential roads.</li> </ul>	<b>No change.</b> Support noted and welcomed.	No
<ul style="list-style-type: none"> <li>Paragraph 5.63: Support the extension of the speed limits.</li> </ul>		
Section 7: Delivery (pages 49 & 50)		
<ul style="list-style-type: none"> <li>Support early liaison with Thames Water over sewerage and sewage treatment capacity.</li> </ul>	<b>No change.</b> Support noted and welcomed.	No
Concept Masterplan (pages 45-47)		
<ul style="list-style-type: none"> <li>The proposals represent a good balance of development, green corridors and open space.</li> </ul>	<b>No change.</b> Support noted and welcomed.	No
<b>Individuals</b>		
<i>Individuals who disagreed made the following comments:</i>		
Object to the principle of development.	<b>No change.</b> See response to objections to the principle of development from organisations above.	No
Object to loss of Green Belt (to Local Allocations)	<p><b>No change.</b> The principle of removing land from the Green Belt (via the Local Allocations sites) was tested and established through the Core Strategy. The role of the Site Allocations is to take forward this approach and to make the actual changes to the Green Belt boundaries that will enable this development to go ahead.</p> <p>When drawing up the Core Strategy the Council had to ensure that it reflected guidance on the Green Belt and other matters set out in the National Planning Policy Framework (NPPF). This was tested as part of the Examination process and the plan found 'sound.' It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the</p>	No

	<p>Green Belt. This is exactly what the Council has done through the Core Strategy and continues to do through its Site Allocations document.</p> <p>The Local Allocations identified within the Core Strategy remain the only proposed housing sites identified for release from the Green Belt.</p>	
Concern that there will be further loss of Green Belt in the western fields, up to the A41 roundabout.	<p><b>No change.</b> There is no reason to expect that this will happen in the future, partly because the land is in the AONB and partly because most of the western fields are proposed to become public open space. The ownership and management of the open space will need to be considered at the implementation stage.</p>	No
Other sites around Tring (i.e. at New Mill, Station Road and Dunsley Farm) are more suitable for release from the Green Belt than LA5.	<p><b>No change.</b> A number of representations seek to promote additional housing sites within the Green Belt. The Core Strategy considered the need for changes to be made to the Green Belt to accommodate new development and resulted in the designation of six Local Allocations. The Site Allocations formally removes these sites from the Green Belt through changes to the Policies Map. Paragraph 8.29 of the Core Strategy clearly states that <i>“The Council’s own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change will be necessary in the Site Allocations DPD, other than to define these locations precisely and correct any minor anomalies that may still exist.... The Council will only re-evaluate the role and function of the Green Belt when it reviews the Core Strategy (see paragraphs 29.8 to 29.10).”</i> This is reflected in the text of Policy CS5: Green Belt which states that <i>“There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted.”</i> This approach was accepted by the Core Strategy Inspector and is reflected in the Site Allocations DPD.</p> <p>A full review of the Green Belt is being carried out to inform the early partial review of the Core Strategy, through the production of a new single Local Plan. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan.</p> <p>Other sites around Tring were assessed when the Core Strategy was prepared, but it was concluded that LA5 was the most suitable site on the edge of the town to release from the Green Belt. This remains the Council’s view.</p>	No
<p>Concern about adequacy of previous public consultation regarding allocation of site</p> <ul style="list-style-type: none"> <li>• LA5 was not selected in a fair and transparent way – only a few residents were invited to the workshop in 2013.</li> <li>• Concern regarding who represented the local community in the previous consultation.</li> <li>• The previous consultation did not comply with the Council’s Statement of Community Involvement.</li> <li>• The Council has not been listening to the views of local people.</li> <li>• There was minimal consultation when the local allocations were being selected.</li> <li>• Information about the previous workshop session, where there was opposition to LA5, should be made available.</li> </ul>	<p><b>No change.</b> The Statement of Community Involvement (SCI) is the Council’s statement of policy on public consultation for planning documents (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has complied with the SCI in preparation of the Site Allocations document and associated master plans.</p> <p>A full summary of the consultation undertaken by the Council on both the Core Strategy and the current Site Allocations document are contained in the relevant Reports of Consultation and Report of Representations. All of these documents are published on the Council’s website and their content has been reported to Members at the appropriate time. It should be noted that the Council intends to review and update its SCI prior to beginning consultation on its new single Local Plan.</p> <p>The Statement of Community Involvement (SCI) is the Council’s statement of policy on public consultation for planning document (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has gone beyond the requirements of this SCI, and of consultation requirements set out within Government planning regulation in preparing the Core Strategy and hence establishing the principle of this site. It has also complied with the SCI in preparation of the Site Allocations document and associated master plans.</p> <p>A full summary of the consultation undertaken by the Council on both the Core Strategy and the current Site Allocations document are contained in the relevant Reports of Consultation and Report of Representations. All of these documents are published on the Council’s website and their content has been reported to Members at the appropriate time.</p> <p>The Council endeavours to make the overall process as user-friendly and as convenient as reasonably possible, although it accepts that there are procedural / technical / legal matters that are not so easy to simplify. The Council made available and accepted paper copies of responses to the consultation. It has also made documents available at a number of deposit points and local libraries to ensure copies can be inspected without the need for the internet.</p> <p>Detailed layout plans on all the proposals will follow when schemes progress to the planning application stage. There will be further consultation as part of that process.</p>	No



<p>Concern over adequacy of current consultation:</p> <ul style="list-style-type: none"> <li>• The consultation is presented as a done deal, ignoring the views of local residents.</li> <li>• The website appears to be deliberately difficult to find and navigate.</li> <li>• The consultation has been very poor.</li> <li>• The consultation was not advertised properly.</li> <li>• The Council has ignored and overridden local people's opposition to the plans.</li> <li>• Has the view of Dacorum's Tenant and Leaseholders Committee been sought?</li> <li>• No alternatives have been put forward, so this is not consultation, but advising "this will happen".</li> <li>• The publicising of the proposed increase in the housing capacity of LA5 has been inadequate.</li> <li>• There has been insufficient consultation with residents living close to LA5.</li> </ul>	<p><b>No change.</b> See the above response to concerns about the adequacy of previous public consultation regarding the allocation of the site.</p>	<p>No</p>
<p>Brownfield land, office to residential conversions and PDL should be used before releasing Green Belt sites for housing. Concern about the robustness and comprehensiveness of the Council's assessment of brownfield land.</p>	<p><b>No change.</b> These points relate to the principle of development on LA5, which has already been decided through the Core Strategy - see response to objections to the principle of development from organisations above and the Report of Representations relating to the Site Allocations DPD.</p>	<p>No</p>
<p>Much of the analysis has been carried out by the developer, with an obvious conflict of interest.</p>	<p><b>No change.</b> The Council has worked very closely and effectively with the developer on the technical studies that have informed the Draft Master Plan. This represents good practice that has been recognised by the Planning Advisory Service (PAS). The Council and its specialist advisers have looked critically at the studies produced by the developer's consultants and has sought changes where necessary.</p>	<p>No</p>
<p>Impact on Chilterns Area of Outstanding Natural Beauty (AONB) and countryside</p> <ul style="list-style-type: none"> <li>• Object to the proposed playing fields, children's play area, Gypsy site and cemetery extension in the AONB. These proposals are contrary to Government policy and there are no exceptional circumstances to justify them. There should be no incursions into the AONB, which should be retained for landscaping and planting. There appears to be no evidence that the western fields is the only possible site around Tring for these facilities.</li> <li>• The visual impact on the AONB would be reduced if more housing is placed close to Aylesbury Road, with the top fields left clear of development (except for the employment area extension) and landscaped.</li> </ul>	<p><b>No change.</b> See above for the response to similar points made by organisations.</p> <p><b>No change.</b> Increasing the area for housing close to Aylesbury Road in order to keep the northern fields free from development would mean building housing in the AONB.</p>	<p>No</p> <p>No</p>



<ul style="list-style-type: none"> <li>Concern about the impact of lighting on the AONB.</li> </ul>	<p><b>No change.</b> Paragraph 5.36 already provides sufficient guidance and is supported by policies within the Core Strategy (particularly Policies CS32: Air, Soil and Water Quality, and CS24: The Chilterns Area of Outstanding Natural Beauty).</p>	No
<p>The construction period will be disruptive.</p>	<p><b>No change.</b> Concerns noted. Mechanisms to mitigate potential disturbance will be considered at the planning application stage. This includes the potential for conditions to be imposed on hours of operation for the building work. Environmental Health powers can also be invoked if the problems persist.</p>	No
<p>Planning policy (pages 3-6)</p> <ul style="list-style-type: none"> <li>Paragraph 2.4: 480 homes in Tring by 2031 is too many – why can't the town's population remain the same or shrink slightly?</li> <li>This section is not clear on all the planned requirements.</li> </ul>	<p><b>No change.</b> This paragraph reflects section 22 in the adopted Dacorum Core Strategy, which states that Tring will deliver around 480 new homes between 2006 and 2031.</p> <p><b>No change.</b> This section is intended only to provide an overview of the planning policy context. Reference should be made to the Core Strategy and the saved policies in the Dacorum Borough Local Plan for further information on the Council's planning policies.</p>	No No
<p>Section 3: Analysis of the site</p> <ul style="list-style-type: none"> <li>The Master Plan ignores completion of full surveys for ecology, traffic and archaeology.</li> <li>Concern that the developer has completed the analysis for LA5 – the Council does not appear to have a balanced viewpoint.</li> </ul>	<p><b>No change.</b> Section 3 makes it clear that these issues will need to be the subject of more detailed studies at the planning application stage. This is normal planning practice.</p> <p><b>No change.</b> See above for the response to concerns that much of the analysis has been carried out by the developer.</p>	No No
<p>Archaeology (page 11)</p> <ul style="list-style-type: none"> <li>Archaeology should be fully explored before planning permission is granted. The need for an archaeological survey before construction should be stated.</li> <li>There are no details on the 2013 archaeological evaluation.</li> </ul>	<p><b>No change.</b> Paragraph 3.5 already covers this point. The archaeological studies required by the County Archaeologist prior to the planning application stage have been completed.</p> <p><b>Change required.</b> Add text to paragraph 3.2 to state that the 2013 archaeological assessment is available on the Council's website.</p>	No Yes
<p>Ecology (page 13)</p> <ul style="list-style-type: none"> <li>The ecological survey is inadequate. No information is given on nesting birds, the need for mitigation measures, impact of lighting on bats, the importance of the chalk grassland meadows. It is incorrect to say there are no obvious signs of badgers.</li> <li>Information should be included on measures to mitigate the harm to ecology.</li> <li>Why has the Council not carried out its own impartial ecological survey?</li> </ul>	<p><b>No change.</b> Paragraph 3.20 states that protected species should be investigated. Indeed, the developers have already commissioned further work from ecology consultants.</p> <p><b>No change.</b> Such measures may be needed at the planning application stage, depending on the outcome of the further investigations referred to in paragraph 3.20.</p> <p><b>No change.</b> See above for the response to concerns that much of the analysis has been carried out by the developer. The Council's ecological adviser has been consulted at each stage of the process and will continue to provide advice and support as necessary.</p>	No No No
<p>Landscape and visual impact (pages 13-16)</p> <ul style="list-style-type: none"> <li>The full visual impact of the development from the south (Tring Park, Stubbings Wood) should be assessed.</li> </ul>	<p><b>No change.</b> The Landscape and Visual Impact Assessment (see Draft Master Plan paragraphs 3.12-3.16) has taken account of the visual impact from the south. Also, as stated in paragraph 3.12, the appraisal will be extended as development proposals become more detailed.</p>	No
<p>Concerns re infrastructure (general) (pages 17-22)</p>	<p><b>No change.</b> As part of preparing its plan for the scale and location of new development in the Borough, the Council has prepared an</p>	No

<ul style="list-style-type: none"> <li>• Tring's infrastructure cannot cope with the additional population arising from development at LA5. There is inadequate information on what infrastructure is required to support the development.</li> <li>• Other proposed developments in Tring will also add to the pressure on the town's infrastructure.</li> <li>• Has the additional impact of the increased number of homes on Tring's infrastructure been taken into account?</li> <li>• An independent third party should be brought in to assess the robustness of the infrastructure planning for Tring.</li> </ul>	<p>Infrastructure Delivery Plan (InDP). The InDP provides information on a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers. Information regarding doctors' surgeries was provided by the Clinical Commissioning Group.</p> <p>The InDP is updated regularly (usually on an annual basis). The current (2015) update has been timed to take account of concerns regarding infrastructure issues raised through the Site Allocations Pre-Submission consultation and provide an opportunity to discuss these further with providers. This revised version of the InDP will accompany the Submission version of the Site Allocations DPD. This update ensures key infrastructure concerns are raised with providers and any necessary amendments made to the DPD and accompanying Local Allocation master plans to ensure these are properly addressed.</p> <p>The 2015 InDP confirms that Council's view that there are no infrastructure issues which prevent LA5 (and other planned development in Tring) coming forward as scheduled.</p>	
<p>Highways and access (pages 17-20)</p> <ul style="list-style-type: none"> <li>• There has not been a proper assessment of the impact of the development on the road network, what improvements are needed and how they will be financed.</li> <li>• The roads near LA5 are already congested and dangerous and cannot cope with the additional traffic from LA5 and general traffic growth. In particular, there are problems at: <ul style="list-style-type: none"> <li>- Western Road, which is often reduced to one way working.</li> <li>- Icknield Way (in the vicinity of the site and near Bulbourne Road)</li> <li>- Miswell Lane: where increased numbers of pedestrians (including children walking to school) will conflict with vehicles on this narrow and dangerous road. Problems on Miswell Lane are compounded by parked cars. The proposed new housing on Miswell Lane (site H/18) should have been taken into account.</li> <li>- The junctions of Miswell Lane with Western Road and Icknield Way.</li> <li>- High Street: where increased congestion will deter visitors to the town centre. It is unrealistic to expect residents from LA5 to use the bypass to travel to Tesco's, the schools and other facilities in the east of the town.</li> <li>- Goldfield, Bishop Wood and Tring schools at start and end times.</li> <li>- A41 roundabout.</li> </ul> </li> <li>• As LA5 is on the west side of Tring, many of the future residents will travel to schools, the town centre, Tesco's etc. by car. People will travel via the town centre (adding to congestion), not via the A41 bypass.</li> <li>• The A41 roundabouts will become congested as a result of the development.</li> <li>• Off-site road improvements are essential to cope with the development, but widening of roads may detract from Tring's market town character.</li> <li>• Making Western Road and Miswell Lane more suitable for buses,</li> </ul>	<p><b>No change.</b> Both the Highway Authority (Hertfordshire County Council) and the Highways Agency (now called Highways England, who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. The Council has also consulted Buckinghamshire County Council, as the County boundary adjoins LA5. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by any party, although it is acknowledged by the Borough Council that some local highways improvements and mitigation measures will be required relating to specific site proposals.</p> <p>The above conclusion reflects work carried out by the Highway Authority in 2012 and 2013 in analysing traffic issues in Tring and identifying possible solutions as set out in the Tring, Northchurch and Berkhamsted Urban Transport Plan. This Plan can be read/downloaded at <a href="http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/tnbutp/">http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/tnbutp/</a>.</p> <p>The Highway Authority's advice is reflected in the planning requirements for LA5 and in the Schedule of Transport Proposals.</p> <p>A Transport Scoping Report on LA5 has been agreed with Hertfordshire and Buckinghamshire County Councils. This document sets out the framework within which the Transport Assessment will be written.</p> <p>Detailed highway issues will be considered in a Transport Assessment as part of the planning application process, for which the Highway Authority are statutory consultees. Appropriate highway improvements and mitigation measures will be secured through developer contributions and agreements. The Transport Assessment will be supported by a Travel Plan written in accordance with the guidance set out by the Highway Authority.</p>	No

<p>bicycles and pedestrians would require removal of parked cars, but most houses on these roads have no off-street parking.</p> <ul style="list-style-type: none"> <li>• Increased pedestrian movements through nearby residential streets will have a negative impact on the area.</li> <li>• Unless good footpaths and cycleways are put in, everyone will drive from LA5 which will ruin the town centre.</li> <li>• Pedestrian access from LA5 to the town is heavily affected by parked cars and moving vehicles – this issue has not been assessed.</li> <li>• There is not enough information on sustainable transport for the new homes.</li> <li>• Concern that road works required for laying new water mains/sewers/gas will cause disruption during the construction of LA5.</li> <li>• As the county boundary falls on the A41 roundabout, so arrangements are needed to ensure that other agencies e.g. Bucks County Council support the proposal.</li> </ul>		
<p>Bus services (paragraph 3.20)</p> <ul style="list-style-type: none"> <li>• What improvements to bus services will be made?</li> <li>• Bus services are being cut, so there is no alternative to the car.</li> <li>• It is not realistic to expect bus services to be improved as a result of the LA5 development.</li> </ul>	<p><b>No change.</b> The site is served by a number of bus routes. Bus provision is a matter for the County Council as highway authority and local bus companies: with decisions on routes and frequency of services strongly influenced by viability considerations. Financial contributions to support local services may be sought at the planning application stage or be funded via the Community Infrastructure Levy.</p>	No
<p>Concern about car parking provision in Tring.</p> <ul style="list-style-type: none"> <li>• It is already difficult parking in the town centre and at the railway station. The LA5 development will make the situation worse.</li> </ul>	<p><b>No change.</b> A lack of parking in the town centre was not identified as a problem when the Highway Authority (Hertfordshire County Council) drew up the Tring, Northchurch and Berkhamsted Urban Transport Plan in 2012/ 13. This Plan can be read/ downloaded at <a href="http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/tnbutp/">http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/tnbutp/</a></p> <p>The Highway Authority has confirmed that the conclusions of this document continue to reflect their view.</p> <p>Car parking at Tring station has been expanded recently. The issue of whether there should be further increases in parking supply at the station is not a matter that can be addressed through the LA5 Master Plan.</p>	No
<p>Utilities infrastructure (paragraphs 3.23-3.25)</p> <ul style="list-style-type: none"> <li>• Paragraph 3.23: Further information is required on what extra capacity is required for gas, water, sewerage, telecoms and electricity. Water and sewerage issues should be dealt with prior to the LA5 development.</li> <li>• Paragraph 3.24: Most drains in Tring are blocked and are rarely cleaned out.</li> </ul>	<p><b>No change.</b> These matters will be looked at in more detail at the pre application and planning application stages.</p> <p><b>No change.</b> This is not a matter that can be addressed through the LA5 Master Plan.</p>	No  No

<p>Capacity at local schools (paragraph 3.26)</p> <ul style="list-style-type: none"> <li>• There is no latent capacity in the local primary schools and the nearest schools (Goldfield and Bishop Wood) are over-subscribed.</li> <li>• The walk to Dundale and Grove schools is too long, especially for children under 5.</li> <li>• Tring School is one of the largest schools in Hertfordshire. It is already full and does not want to expand – the school’s concerns should be respected. Also, the traffic at the school’s drop off and pick up point is already dangerous.</li> <li>• The Draft Master Plan says that Tring School will not expand, so where will the additional pupils go?</li> <li>• Some local children already have to go to schools outside the town, as Tring’s schools are full. Some children will have to travel to schools outside Tring (Long Marston School is also full).</li> <li>• There have been no consultations with schools in Tring about possible expansion.</li> <li>• The number of children who will need school places over the next few years is expected to increase. Also, affordable housing and Travellers’ sites have higher than normal birth ratios, which will add to the pressure on schools.</li> <li>• If schools are extended, it will mean reducing valuable playing areas.</li> <li>• The closure of Francis House Preparatory School will increase the shortage of spaces at local schools.</li> <li>• LA5 would add about 150 children to the school population of Tring.</li> <li>• Capacity at schools should be expanded before the LA5 development goes ahead.</li> </ul>	<p><b>Change required</b> to clarify the position regarding potential additional education provision in Tring.</p> <p>At the request of the Council, Officers in the Children’s Schools and Families Unit at Hertfordshire County Council have provided updated information regarding schooling issues in Tring.</p> <p>For primary schools this information shows a predicted surplus of 27 places for 2015/16, 52 for 2016/17 and 44 for 2017/18. This is out of a total reception place capacity of 200 spaces across the town. (The County Council do not model primary school capacities beyond a 4 year period).</p> <p>The updated information from the County Council also shows that primary schools in Tring have sufficient latent capacity to provide for housing growth to 2031. This conclusion reflects the scope to expand Dundale Primary School to 2 forms of entry and expand The Grove Primary School to 3 forms of entry.</p> <p>In terms of secondary school capacity, there is predicted to be a small deficit of places in the period 2017/18-2021/22 of between 1 and 15 places. Before and after this period there is expected to be a small surplus. The County Council are happy that the Core Strategy refers to the potential for the secondary school to expand on its existing site, and the provision of detached playing fields to enable this expansion.</p> <p>For clarity, it is proposed to include some additional information in the Draft Master Plan.</p> <p>It should also be noted that the following changes are proposed to the Site Allocations DPD in the ‘Focused Changes’ document (August 2015):</p> <ul style="list-style-type: none"> <li>• Add text to section 7 to explain that the forecast needs for school places in Tring can be met by expanding Tring Secondary School (including the provision of detached playing fields) and expanding Dundale and The Grove Primary Schools.</li> <li>• Include the proposed detached playing fields for Tring Secondary School in the Schedule of Leisure Proposals and Sites in section 7 of the Site Allocations Written Statement.</li> <li>• Include the location of these detached playing fields on the Policies Map. This was requested by Hertfordshire County Council through their representations (see response to issues relating to section 7 of the Site Allocations).</li> <li>• Add text to the Tring Place Strategy (section 13 in the Written Statement) to reflect the above.</li> </ul>	<p>Yes</p>
<p>Capacity at local doctors’ surgeries (paragraph 3.27)</p> <ul style="list-style-type: none"> <li>• It is already difficult to obtain an appointment at Rothschild’s doctors’ surgery in Western Road and the new housing at LA5 will make the situation worse. Also, there are too few car parking spaces at the surgery. The other surgery in Tring has only one doctor and is further from LA5. There is no obvious scope to extend the existing surgeries.</li> <li>• Capacity doctors’ surgeries should be expanded before the LA5 development goes ahead.</li> <li>• No mention is made of the need for dental provision.</li> </ul>	<p><b>Change required.</b> Amend paragraph 3.27 to reflect the views of the Herts Valleys Clinical Commissioning Group (CCG). Officers from the Borough Council have met representatives of the CCG as part of work to update the Infrastructure Delivery Plan (InDP). They have confirmed that they do not anticipate any capacity problems in the foreseeable future given known developments in Tring, including LA5.</p>	<p>Yes</p>

<ul style="list-style-type: none"> <li>• Has adequate consultation been undertaken with the Clinical Commissioning Group and the local GP practices?</li> </ul>		
<p>Capacity at local shops</p> <ul style="list-style-type: none"> <li>• A shop and/or community hall should be included on LA5.</li> <li>• Paragraph 3.28: Local shops in Western Road and Miswell Lane are run down and tired.</li> <li>• Paragraph 3.28: The shops e.g. Tesco's is busy and its car park is full at weekends. LA5 will add to the problems.</li> </ul>	<p><b>No change.</b> As explained in paragraph 3.28, the number of homes proposed is too low to justify the inclusion of any shops on the site, whilst the Western Road local centre and Tring town centre provide facilities for day to day shopping requirements.</p> <p>The LA5 development is too small to justify the provision of a community hall.</p>	No
<p>Police</p> <ul style="list-style-type: none"> <li>• Tring does not have adequate police presence.</li> </ul>	<p><b>No change.</b> Paragraph 6.3 in Dacorum's Infrastructure Delivery Plan explains that Tring Police Station has been sold for residential development and the Safer Neighbourhood team now operate from the Town Council's offices. Hertfordshire Constabulary does not have any plans to increase its presence in Tring.</p>	No
<p>Section 4: Development constraints and opportunities (pages 23-26)</p> <ul style="list-style-type: none"> <li>• Object to the failure to treat the AONB as a major constraint.</li> <li>• The lack of space at local schools should be treated as a constraint.</li> <li>• Bullet point 4 under 'Opportunities': the site is too far from the town centre for there to be an opportunity for pedestrian access to the town centre or local shops.</li> </ul>	<p><b>Change required:</b> Whilst bullet points 2 and 3 under 'Constraints' on page 25 relate to the AONB, it is agreed that an additional bullet should be added to refer to the fact that the western part of LA5 is within the AONB.</p> <p><b>No change.</b> See above for the response to objections to paragraph 3.26 on schools from individuals. This response shows that space at local schools is not a constraint.</p> <p><b>No change.</b> Some people will walk from the LA5 site to the town centre and local shops are close enough to be accessible for many of the new residents by foot.</p>	Yes  No  No
<p>Vision (page 27)</p> <ul style="list-style-type: none"> <li>• The proposed development is contrary to paragraph 1 in the vision statement, as it will not enhance the AONB.</li> <li>• The last paragraph states that the use and management of the western fields will enhance the appearance and enjoyment of the AONB, but this will happen only if there is no incursion into the AONB.</li> </ul>	<p><b>No change.</b> The overall proposals for LA5 will not harm the special qualities of the AONB, whilst some elements of the proposals, such as the open space in the western fields and the landscaping improvements have the potential to bring about an enhancement.</p>	No
<p>Housing capacity (paragraph 5.5)</p> <ul style="list-style-type: none"> <li>• Object to the increase in proposed dwellings from 150 in the Core Strategy to 180-200 in the draft master plan. There is no justification for this increase and it will result in an unacceptable intrusion into the AONB. The 'detailed testing' referred to in line 4 has not been explained. The housing numbers should be reduced, with housing kept well clear of the AONB. The increase in proposed homes does not fit with the aims of having a soft edge and transition with the AONB and a defensible Green Belt boundary.</li> </ul>	<p><b>No change.</b> The area of land considered suitable for development when the Core Strategy was prepared is stated in paragraph 2.5 of the LA5 Statement of Common Ground (August 2012). This document was agreed between the Council and CALA Homes for the Core Strategy public examination. The area of land involved (9.8 hectares) is now called the eastern fields development area on the amended Concept Masterplan (see Figure 9) and is precisely the same as envisaged in 2012. It follows a north-south hedgerow and equates to the non-AONB part of LA5.</p> <p>The Core Strategy proposed 'around' 150 homes at LA5. This was a cautious figure which reflected uncertainty over how much of the developable area would be devoted to housing and how much to other uses (employment, cemetery and open space). The more detailed work carried out to produce the Draft Master Plan has resulted in an initial conclusion on the amount of housing land (7.7 hectares), the size and mix of housing on the site and landscaping/open space within the housing area. As a result, it has been</p>	No

<ul style="list-style-type: none"> <li>• Increase homes to 250, to avoid or reduce the need for further housing sites in Tring in the next plan. LA5 is the only suitable site in Tring, so higher density housing should be allowed with a small encroachment into the AONB.</li> </ul>	<p>possible to increase the estimated housing capacity without enlarging the actual development area.</p> <p><b>No change.</b> 180-200 homes is considered to be the most appropriate estimate of the housing capacity at LA5, given the site's edge of town location, the amount of land available for housing and the likely houses types in the development. Any encroachment of housing into the AONB would harm the special qualities of the AONB and be contrary to Core Strategy Policy CS24.</p>	No
<p>Affordable housing (paragraph 5.6)</p> <ul style="list-style-type: none"> <li>• Tring residents (particularly people who have grown up in the town, including newly formed households, but not the over 55s), should be given priority to live in the affordable housing.</li> <li>• The proportion of shared ownership housing should be increased.</li> <li>• 40% is very high for affordable homes.</li> <li>• Tring needs more affordable housing, but this need can be met on other sites.</li> <li>• Social/affordable housing will be isolated from the rest of the town and concentrated. It will be unaffordable due to transport constraints.</li> <li>• There is no guarantee that the new housing will be 'affordable'.</li> </ul>	<p><b>No change.</b> The Borough Council has nomination rights to 75% of the rented affordable homes. These properties will be allocated through the Council's 'Housing Allocations Policy' to people with local connections in the Borough. Housing Associations will decide the occupancy of the rest of the affordable housing in accordance with their own allocation policies.</p> <p><b>No change.</b> The proportion of shared ownership sought reflects the Council's normal approach, which is based on evidence of housing needs.</p> <p><b>No change.</b> The proportion is considered appropriate and viable given the edge of town location and the high need for affordable housing.</p> <p><b>No change.</b> LA5 is easily the largest proposed housing site in Tring and it is essential that it plays a major part in helping to meet the need for affordable housing.</p> <p><b>No change.</b> The location of not isolated. It is within walking distance of many local facilities and is reasonably well served by buses.</p> <p><b>No change.</b> The affordable housing will have to comply with the affordable housing definition in the Council's 'Affordable Housing Supplementary Planning Document'.</p>	No No No No No No
<p>Housing mix and density (paragraphs 5.7-5.9)</p> <ul style="list-style-type: none"> <li>• Tring needs affordable family homes and starter homes for local people, not larger 'executive' houses which will attract London commuters.</li> <li>• The new housing will be too small to be fit for purpose.</li> <li>• A different housing mix will be needed if the Crossrail route to Tring goes ahead.</li> <li>• 2/3 bedroom housing should be provided for people wishing to downsize from larger houses.</li> <li>• The new housing should consist of houses, not flats.</li> <li>• Further information should be given on the 60% of housing that will not be affordable.</li> <li>• Paragraph 5.7: The development should include single storey housing for pensioners.</li> </ul>	<p><b>No change.</b> The guidance in paragraphs 5.7-5.9 is considered to be appropriate, given the location of the site and the split between affordable and market housing. A range of house types, sizes and tenures will be provided. Paragraphs 5.7-5.9 indicate that most of the new dwellings will be houses rather than flats, the development will include smaller homes and some affordable housing for elderly people may be provided. The precise size and mix of homes will be considered at the planning application stage and take account of market demand and local needs.</p>	No
<p>Gypsy and Traveller site (paragraphs 5.11-5.17)</p> <ul style="list-style-type: none"> <li>• Object to the proposed Gypsy site. Reasons include: - There does not appear to be any robust evidence that shows a need for additional provision in the Tring area.</li> </ul>	<p><b>No change.</b></p> <p>See above for consideration of objections to the proposed Gypsy and Traveller site from organisations because of the site's location in the Green Belt and the AONB.</p> <p>The original technical work was prepared on a South West Hertfordshire basis by consultants Scott Wilson and included a large number of sites that were coded red, amber, green - depending on the consultant's view of their suitability. All were in the Green Belt</p>	No

<ul style="list-style-type: none"> <li>- The location in the Green Belt and AONB is contrary to Government guidance and no justification has been given for the proposal.</li> <li>- If the Travellers' site is retained, it should be located next to the housing development.</li> <li>- Disagree with the statement in paragraph 5.12 that the Gypsy site would have only a limited impact on the AONB.</li> <li>- The proposed location is inappropriate as it is highly visible on a main approach into Tring and will detract from the Green Gateway. Landscaping will not provide adequate screening.</li> <li>- The site is too close to the existing and new housing, the employment area and the proposed cemetery extension.</li> <li>- There is no evidence to show that this is the most suitable location for a Gypsy site. On what basis was this site chosen?</li> <li>- Previous proposals for LA5 did not include a Gypsy site.</li> <li>- The proposed location is close to one busy road and not far from another.</li> <li>- The number of pitches proposed at LA5 is higher than at LA1 and LA3 as a proportion of the number of homes proposed.</li> <li>- Concern about security issues.</li> <li>- Uncertainty over whether people will buy the new houses on LA5 close to the Travellers' site.</li> <li>- The value of existing nearby houses will be reduced.</li> <li>- Concern about impact of Travellers' site on local amenities, particularly schools.</li> <li>- The construction of hardstanding and ancillary facilities will change the land to brownfield.</li> <li>- The site should instead form part of the proposed western fields open space.</li> <li>- The site is too isolated.</li> <li>- The site should be placed further away from the new development.</li> <li>- The proposal is not supported by any Tring Councillors, CALA</li> </ul>	<p>or Rural Area as no suitable urban sites were found. Many site suggestions were some distance from settlements, services and facilities and would not comply with Government guidance (or our own Core Strategy policy). In addition the emphasis was on identifying suitable locations. Landownership was not considered in the study, and therefore it was not clear how many sites in reality had reasonable prospects of actually being delivered. The full Scott Wilson Report is on the Council's website: <a href="http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/gypsies-travellers-study-potential-sites-(stage-2)">http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/gypsies-travellers-study-potential-sites-(stage-2)</a></p> <p>Feedback on these potential sites was sought as part of Site Allocations consultation in 2008. Following analysis of these consultation responses, a report was considered by Members regarding how and where provision should be made within the Borough. This resulted in the current policy approach of seeking to integrate sites with new 'bricks and mortar' housing. The relevant Cabinet Report is available online: <a href="http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0</a></p> <p>A brief summary of the process the Council has been through with regards to considering and assessing potential Gypsy and Traveller sites is set out in the Issues Paper the Council prepared for the Core Strategy Examination: <a href="http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement---dacorum-borough-council.pdf?Status=Master&amp;sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement---dacorum-borough-council.pdf?Status=Master&amp;sfvrsn=0</a>. This clearly explained to the Inspector the Council's proposed approach of setting strategic policies (plus a monitoring target for new pitch provision) through the Core Strategy and identifying precise pitch locations and requirements on the three largest Local Allocations (LA1, LA3 and LA5) through the Site Allocations. The specialist consultants who prepared the Council's latest Traveller needs Assessment (ORS) stated that the incorporation of new sites within new urban extensions was emerging as a 'good practice' approach.</p> <p>Other points to note are as follows:</p> <ul style="list-style-type: none"> <li>• Paragraph 5.13 in the Draft Master Plan states that further landscaping should be provided to ensure that the Gypsy and Traveller site is well contained in the landscape.</li> <li>• The Head of the Hertfordshire County Council's Gypsy and Traveller section, has advised (after consulting tenants) that the planned location of the Gypsy and Traveller site next to the proposed cemetery extension is acceptable. His advice is that there is such a high demand for pitches, that he cannot see Gypsies and Travellers turning them down.</li> <li>• It is not accepted that the site would be poorly integrated with the settled community – indeed, Hertfordshire County Council's Gypsy Unit Manager and a resident living on the Long Marston Gypsy site support the proposed location.</li> <li>•</li> </ul> <p><i>Note: Legal advice is currently being sought on the implications of the Government's recent changes to the definition of Gypsies and Travellers in the Gypsy and Traveller Policy Statement. If any changes are required to the number or location of new pitches, this will be considered via the Report of Representation on the Pre-Submission Site Allocations Focused Changes. Any consequential changes needed to the master plans for consistency will be made via delegated authority.</i></p>	
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<p>Homes or the local residents.</p> <ul style="list-style-type: none"> <li>- The site is not environmentally sustainable.</li> <li>- Elderly people may be afraid to go to the cemetery extension given its location next to the Travellers' site.</li> <li>- Travellers will not want to live next to a site associated with death (i.e. cemetery extension).</li> <li>- Putting Travellers in this discrete location means that they will not integrate with the local community. The proposed location does not comply with criterion (b) in Core Strategy Policy CS22 (locate close to facilities).</li> <li>- Measures are needed to prevent the future expansion of the Gypsy site. As the area around the Gypsy site is open land, further Gypsies may move onto this land illegally.</li> <li>- The land proposed for a Gypsy site should instead be used for social housing.</li> <li>- As the land is in the AONB, it would be more appropriate to use it for the cemetery extension.</li> <li>- If the Travellers' site is omitted, it leaves extra land, which could be used for additional housing or a larger extension to the employment area.</li> </ul>		
<p>Alternative possible locations for the Gypsy and Traveller site</p> <ul style="list-style-type: none"> <li>• There are already Gypsy sites nearby at Long Marston (which should be sufficient for Tring's needs) and just over the county boundary at Cheddington, Wendover and Weston Turville.</li> <li>• More suitable locations for new Gypsy sites exist on: <ul style="list-style-type: none"> <li>○ the former household waste site at Tringford Road, Tring</li> <li>○ Duckmore Lane (south of Aylesbury Road), Tring</li> <li>○ other local allocations more centrally placed in Dacorum e.g. LA4 in Berkhamsted and LA6 in Bovingdon.</li> <li>○ the Egerton Rothesay site in Berkhamsted.</li> <li>○ other sites in Berkhamsted</li> <li>○ other sites in Bovingdon</li> <li>○ other sites in Hemel Hempstead</li> <li>○ brownfield sites in Tring or elsewhere in the Borough.</li> </ul> </li> </ul>	<p><b>No change.</b> The potential to extend the two existing Gypsy sites within the Borough (Three Cherry Trees Lane, Hemel Hempstead and Long Marston) has been considered and discussed with the Gypsy and Traveller Unit at Hertfordshire County Council, who own and manage both sites. They have advised that the Three Cherry Trees Lane site is already larger than the ideal site size and should not be extended.</p> <p>The Long Marston site is not ideally located in terms of access to services and facilities and is already considered to be of the maximum size suitable for its rural location on the edge of a village. The potential for expansion is severely limited due to land ownership (with an area of land that may have been appropriate for expansion being bought by a local farmer with the express intent of preventing this from occurring). There is also a written undertaking between the County Council and local Parish Council that there will be no further site expansion. Whilst this is not legally binding, it is a further constraint to expansion. Nevertheless, the Council has approached the owners of land adjacent to the Long Marston site, to explore the potential for further expansion of this site. The owners of this land have responded by confirming their opposition to the site being expanded.</p> <p>Other sites suggested through the Pre-Submission consultation and also submitted as having development potential through the 'call for sites' process' have also been considered and discounted as realistic or appropriate options. A fuller explanation is set out in the Homes and Community Services Background Issues Paper. The text of the September 2014 version of this document has been updated to elaborate on the explanation previously given, as a result of representations received. New sites suggested have also been appraised.</p>	<p>No</p>



<p>Other points about the Gypsy and Traveller site</p> <ul style="list-style-type: none"> <li>• Core Strategy Policy CS22 contains some important points that have been omitted from the homes principles.</li> <li>• Guidance is needed on what material will be used to screen the Travellers site.</li> <li>• There is insufficient detail about the Gypsy site. Its size should be stated and its boundaries shown on a map.</li> <li>• Paragraph 5.14: It is unclear what '5 pitches' means.</li> <li>• Paragraph 5.15: All traveller provision in Dacorum should be made through housing associations. The need is for affordable rented Gypsy sites, not private sites.</li> <li>• Paragraph 5.15: The potential for any Traveller site being self-managed must be seriously questioned.</li> <li>• Paragraph 5.15: The Council should provide ongoing support services, to ensure the site is well run and help with school integration and youth activities.</li> <li>• Paragraph 5.16: It is clear from this paragraph that the proposed Gypsy site is speculative and is not based on firm demand.</li> <li>• Paragraph 5.17: It appears that the main reason for locating the Gypsy site away from the development area is that CALA Homes' opposition to a Gypsy site the reason why it is proposed in the AONB?</li> <li>• Separating the housing from the Gypsy site by just a screen is unacceptable.</li> <li>• A Gypsy site cannot be justified next to the cemetery, which is a heritage asset.</li> <li>• Object to the concept of a permanent travellers' site, as gypsies have opted for a nomadic lifestyle, so the site should not become a long-term residence.</li> </ul>	<p><b>No change.</b> All points are appropriately covered.</p> <p><b>Change required.</b> Paragraph 5.13 already refers to the need for further landscaping. However, the guidance on this matter should be expanded to stress the need for the Gypsy and Traveller site to be well screened by landscaping particularly along the proposed new Green Belt boundary and Aylesbury Road, but that screening through walls and solid fences will not be appropriate.</p> <p><b>Change required.</b> The text should state that the Gypsy and Traveller site will have a site area of about 0.4 hectares. Figure 9 (Concept Masterplan) should be amended to show the boundaries of the proposed Gypsy and Traveller site.</p> <p><b>Change required.</b> Add text to explain the meaning of a pitch.</p> <p><b>No change.</b> Many Gypsies and Travellers prefer to live on privately provided sites, rather than housing association sites.</p> <p><b>No change.</b> This is one of the management mechanisms that can be considered and is common practice elsewhere in the country. The County Council's Gypsy and Traveller Unit advise that self-managed sites are often very well run and experience fewer problems than those managed by local authorities.</p> <p><b>No change.</b> This is not a matter that can be addressed through the LA5 Master Plan.</p> <p><b>No change.</b> The proposal reflects the evidence in the Council's Gypsy and Traveller needs assessment.</p> <p><b>No change.</b> The main reasons for selecting the site are set out in paragraphs 5.12 and 5.13 in the Draft Master Plan. Further explanation is set out in the Homes and Community Services Background Issues Paper.</p> <p><b>No change.</b> The proposed Gypsy and Traveller site does not adjoin the proposed housing.</p> <p><b>No change.</b> It is the existing cemetery which is a heritage asset, not the proposed cemetery extension. The setting of the existing cemetery will not be affected by the Gypsy and Traveller site.</p> <p><b>No change.</b> The Council's approach is consistent with the Government's 'Planning policy for traveller sites'.</p>	<p>No</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>
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<p>Employment area extension – the proposed extension is not justified (page 30)</p> <ul style="list-style-type: none"> <li>The employment area extension is unnecessary, as there are vacant units on the existing industrial estate. There is no definite employment opportunity – just potential. Concern about the desirability of new business premises in this location.</li> <li>If this land is not needed for employment uses, it should be developed for housing.</li> </ul>	<p><b>No change.</b> The justification for extending the employment area is contained in the SW Hertfordshire Employment Land Update (Roger Tym &amp; Partners, June 2010). Paragraph 4.51 in this report advised the Council that:</p> <p><i>“Icknield Way should be protected and may be expanded to cater for businesses relocating from the other sites in the town and inward investors. We have not reviewed the quantum of space required but there is a natural extension of approximately 2.6 hectares by extending the rear boundary in a straight line up to the boundary with the AONB and to the Icknield Way frontage.”</i></p> <p>The principle of extending the employment area has already been established through the Core Strategy. The proposals for LA5 on page 166 of the Core Strategy include “Extension to the employment area in Icknield Way Industrial Estate”. Also, paragraph 22.8 refers to replacement employment provision (for land lost elsewhere) being made through an extension to the Icknield Way general employment area. This proposal is consistent with local objective 4 (Core Strategy page 165) to maintain the current employment provision. Reference should also be made to paragraphs 5.18 and 5.19 in the LA5 Draft Master Plan.</p> <p>The Council has already received expressions of interest in the land for employment uses and its allocation is supported by the advice of a local commercial agent.</p> <p><b>No change.</b> The future of the land will be reconsidered if, after lengthy and effective marketing, it becomes clear that there is no interest in the land for employment purposes. However, this is not expected to be necessary.</p>	<p>No</p> <p>No</p>
<p>Employment area extension – the proposed extension is too small (page 30)</p> <ul style="list-style-type: none"> <li>The employment area extension is too small to provide sufficient local jobs or allow provision of affordable premises for small and medium sized firms.</li> </ul>	<p><b>No change.</b> Paragraph 4.51 in the SW Hertfordshire Employment Land Update (Roger Tym &amp; Partners, June 2010) advised the Council that:</p> <p><i>“Icknield Way should be protected and may be expanded to cater for businesses relocating from the other sites in the town and inward investors. We have not reviewed the quantum of space required but there is a natural extension of approximately 2.6 hectares by extending the rear boundary in a straight line up to the boundary with the AONB and to the Icknield Way frontage.”</i></p> <p>Whilst there is a need for some land to meet future needs for B-class employment floorspace in Tring, there is also a clear need to provide more housing land. It is considered that the size of the proposed employment area extension (0.75 hectares) represents an appropriate balance between housing and employment development on LA5.</p>	<p>No</p>
<p>Employment area extension – environmental impact (page 30)</p> <ul style="list-style-type: none"> <li>The employment area extension will cause more noise and traffic and adversely affect residents. It will also affect house prices.</li> </ul>	<p><b>No change.</b> There should not be a noise problem, because (as stated in paragraph 5.20), development will be restricted to use class B1, so noisy industrial uses will not be accepted. The proposed employment area is modest in size and will not add significantly to traffic flows from the Icknield Way Industrial Estate. House prices are not a planning matter, but it seems unlikely that the employment area will have a significant impact on prices.</p>	<p>No</p>
<p>Employment area extension – acceptability of indoor leisure uses (page 30)</p> <ul style="list-style-type: none"> <li>Clarification sought on whether indoor leisure uses will be acceptable on the employment area extension.</li> </ul>	<p><b>No change.</b> Indoor leisure uses are not normally permitted on General Employment Areas (see saved Policy 31 in the Dacorum Local Plan). Such uses will be permitted only if a very strong case is put forward, as part of a planning application, to justify making an exception to the policy.</p>	<p>No</p>
<p>Design – general points (pages 31 and 32)</p> <ul style="list-style-type: none"> <li>There is insufficient information on the design principles to make a clear judgement.</li> <li>The design is poor.</li> </ul>	<p><b>No change.</b> It is considered that pages 30 and 31 provide appropriate guidance. The guidance in the master plan should also be read alongside relevant design policies in the Core Strategy (i.e. Policies CS10 to CS13)</p> <p><b>No change.</b> There is no design for the new homes at present – this will not come until the planning application stage. It is the role of</p>	<p>No</p>



<p>Green space – concern over the extent of recreation uses</p> <ul style="list-style-type: none"> <li>• The green space should not be too regimented or restricted to those using sports pitches or the children’s play area.</li> <li>• Too much is being required of the western fields, if the ecological and aesthetic aspirations are to be met.</li> </ul>	<p><b>No change.</b> The existing text, plus the changes referred to above will ensure that the western fields is neither too regimented nor used mainly for sports pitches. As a result, it is possible to meet the ecological and aesthetic aspirations.</p>	<p>No</p>
<p>Green space – provision should be made for outdoor sports</p> <ul style="list-style-type: none"> <li>• Playing pitches should be provided in the western fields.</li> <li>• Tennis courts, cricket pitches and football pitches should be provided.</li> </ul>	<p><b>No change.</b> Given the location within the AONB, it may be concluded that the western fields is not the most appropriate location for additional playing pitches to serve Tring. Tennis courts are not seen as acceptable in this location.</p>	<p>No</p>
<p>Green space - children’s play areas</p> <ul style="list-style-type: none"> <li>• The play area for older children is too far from existing housing to or the rest of the town to be used and it will not be safe for children to be left unattended.</li> <li>• The children’s play area should be fenced, for example, to keep dogs out.</li> <li>• Concerns about the location of the proposed location of the Children’s’ play area close to the Traveller site.</li> <li>• More youth sports areas are needed. Good models are the floodlit space on Brook Street, Tring and the skate park at Aston Clinton Park.</li> <li>• A trim trail for teenagers in the western fields should be considered.</li> <li>• Paragraph 5.38: The toddler play area is too small – it should cater for up to 9 or 10 year olds.</li> </ul>	<p><b>No change.</b> The proposed children’s play area is only about 350 metres from the existing housing area. The Council’s Parks and Open Spaces Officer supports the proposed location.</p> <p><b>No change.</b> This is a matter of detail, which should be considered at the implementation stage.</p> <p><b>No change.</b> It is not considered that this factor makes the proposed location unacceptable, particularly as the location is about 250 metres from the proposed Traveller site.</p> <p><b>No change.</b> The western fields are not seen as an appropriate place for such activities, given the AONB location. However, paragraph 5.40 already states that the play area should include provision for teenagers.</p> <p><b>No change.</b> This is a matter of detail that can be considered at the implementation stage.</p> <p><b>No change.</b> The play area in the western fields will cater for children of this age group.</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>
<p>Green space – location of green space</p> <ul style="list-style-type: none"> <li>• The green space should be placed in the centre of the development and passed onto a non-developer.</li> </ul>	<p><b>No change.</b> Locating a large area of green space within the development area is not favoured, as it would considerably reduce the scope for LA5 to provide much needed housing.</p>	<p>No</p>
<p>Green space – long term protection and management</p> <ul style="list-style-type: none"> <li>• The open space must not be released for development at a later date. It should be legally protected from future development. The maintenance and management of the green space in the AONB has not been addressed in the Draft Master Plan.</li> </ul>	<p><b>Change required.</b> Add text to state that the decisions on the future ownership of the western fields open space and the long term management and maintenance of the land will be made at the planning application stage. These arrangements will ensure that the land remains as open space in the long term.</p>	<p>Yes</p>
<p>Landscape – Green Belt boundary (page 36)</p> <ul style="list-style-type: none"> <li>• There is no need to create a new permanent, defensible Green Belt boundary as the existing Green Belt boundary already provides one. Also, the document fails to explain that the proposed development is on existing Green Belt land.</li> </ul>	<p><b>Change required.</b> A new defensible Green Belt boundary needs to be defined, because the Council has demonstrated through the Core Strategy that there are exceptional circumstances at LA5 that justify releasing land for development. However, paragraph 5.43 should be amended to reflect the fact that the Council is now proposing the exclusion of the cemetery extension and the Gypsy and</p>	<p>Yes</p>

<ul style="list-style-type: none"> <li>Concern that the new Green Belt boundary may be changed again, with development extending further outwards.</li> </ul>	<p>Traveller site from the Green Belt as well as the area for housing and employment development in the east part of LA5.</p> <p><b>No change.</b> See the response above to objections on 'green space – long term protection and management'.</p>	No
<p>Landscape – views into and out of the site (page 36)</p> <ul style="list-style-type: none"> <li>Paragraph 5.41: The LA5 development will harm views from the Chiltern Hills and the A41 roundabout. The development will also affect views from the site to the surrounding countryside.</li> </ul>	<p><b>No change.</b> The Draft Master Plan already provides sufficient guidance on measures to minimise the harm to views into the site and, as far as possible, retain views out from the site. See, for example, paragraphs 5.29, 5.41, 5.43, 5.44 and 5.48.</p>	No
<p>Landscape – trees and hedgerows (page 36)</p> <ul style="list-style-type: none"> <li>Paragraph 5.42: Concern that all the existing hedgerows will be destroyed.</li> </ul>	<p><b>No change.</b> Paragraph 5.42 already requires that the existing hedgerows to be retained and enhanced.</p>	No
<p>Landscape – green gateway into Tring (page 36)</p> <ul style="list-style-type: none"> <li>The LA5 development will harm the green gateway into Tring, particularly as the development will be highly visible as it will be on rising ground. Paragraph 5.44: The green gateway into Tring must be preserved and improved with additional landscaping.</li> <li>Preserve the open aspect along Aylesbury Road by providing a 20 metre swathe between the existing and proposed cemeteries.</li> </ul>	<p><b>No change.</b> Paragraph 5.44 already states the need for tree planting to enhance the green gateway into Tring. In addition, paragraphs 5.26 and 5.29 on design and the 'landscape' section of the Draft Master Plan will ensure that the development is not highly visible.</p> <p><b>No change.</b> A wide tree planting strip along Aylesbury Road is not favoured - see paragraph 5.44 which explains that the tree planting along Icknield Way and Aylesbury Road should maintain views into and out of the site to connect the site visually with the surrounding countryside.</p>	No  No
<p>Landscape – other points (pages 36-39)</p> <ul style="list-style-type: none"> <li>Insufficient detail has been given on the landscaping of the site.</li> <li>Paragraph 5.48: The existing public footpath from Okeley Lane to Icknield Way should not be diverted.</li> </ul>	<p><b>No change.</b> The level of detail given is appropriate to a master plan. Full details will be provided at the planning application stage, through a detailed Landscape Strategy (see paragraph 6.5).</p> <p><b>No change.</b> A modest diversion of the public footpath is considered to be acceptable, in order to facilitate a good layout of the housing development. Paragraph 5.48 emphasises the need for the realigned footpath to be landscaped and for some views of the Chilterns escarpment to be retained.</p>	No  No
<p>Cemetery extension – location of the cemetery extension (page 39)</p> <ul style="list-style-type: none"> <li>Object to the proposed location of the cemetery extension within the AONB. Even a 'green' cemetery will be intrusive in the AONB and it will lead to demand for built development given the distance from the existing cemetery.</li> <li>Instead, the existing cemetery should be extended northwards and westwards within the area to be excluded from the Green Belt. This extension should be secured through a Section 106 agreement.</li> <li>The cemetery extension should not be detached from the existing cemetery.</li> <li>The extension should be located north of the existing cemetery, so that it forms a buffer between existing housing and the proposed new housing.</li> <li>The location for the cemetery extension seems to have been chosen so that more housing can be built on the LA5 site.</li> <li>Having funeral processions going through a housing development makes no sense and is not desirable for mourners.</li> </ul>	<p><b>Change required</b> – retain the proposed cemetery extension site, but remove the site from the Green Belt – see the response above to objections from organisations to the location of the cemetery extension.</p>	Yes

<p>Cemetery extension – cemetery car park (paragraph 5.54)</p> <ul style="list-style-type: none"> <li>• The proposed cemetery car park is in the wrong place.</li> <li>• The car park should be located in the cemetery extension in the western fields.</li> <li>• The cemetery car park area is too big in relation to the size of the cemetery extension.</li> <li>• Concerned that visitors to the existing cemetery will still park in Donkey Lane, despite the proposed new cemetery car park.</li> <li>• The cemetery car park will attract anti-social behaviour and will be used by residents or Gypsies unless guarded. CCTV should be installed in the new cemetery car park.</li> </ul>	<p><b>Change required.</b> Retain the car park site as proposed, but amend cemetery extension principle 2 and paragraph 5.54 to delete reference to the other facilities for cemetery use. This reflects advice from the Council's Bereavement Services Team Leader that the other facilities should be built within the existing cemetery. Paragraph 5.54 should also be amended to require good landscaping of the car park.</p> <p>The car park is not proposed within the cemetery extension, in order to avoid any harm to the AONB.</p> <p>The size of the site proposed for the cemetery car park is large enough for the 30 parking spaces considered necessary and for adequate landscaping.</p> <p>Some people may still park in Donkey Lane, but the numbers are likely to be considerably lower if a dedicated cemetery car park is provided.</p> <p>Security issues and whether CCTV is required can be addressed at the implementation stage.</p>	<p>Yes</p>
<p>Cemetery extension – other points (pages 39 and 40)</p> <ul style="list-style-type: none"> <li>• CCTV should be provided along the link from the existing cemetery, in the car park and in the cemetery extension.</li> </ul>	<p><b>No change.</b> Security issues and whether CCTV is required can be addressed at the implementation stage.</p>	<p>No</p>
<p>Utilities and services (page 41)</p> <ul style="list-style-type: none"> <li>• No objection providing drainage in town centre is addressed.</li> </ul>	<p><b>No change.</b> Noted.</p>	<p>No</p>
<p>Highways and access – access into LA5 (pages 41-43)</p> <ul style="list-style-type: none"> <li>• Paragraph 5.59: Concern that the proposed new junctions onto Aylesbury Road and Icknield Way will be inadequate. The new access road should join Icknield Way at a roundabout junction, as Icknield Way is already busy. This junction should be designed to take account of the large vehicles and heavy peak hour traffic flows.</li> <li>• Too few accesses into the site are proposed. Concern that there would be three accesses (to housing, cemetery extension and Travellers' site) close together on Aylesbury Road.</li> <li>• The access into the Traveller site would be dangerous.</li> </ul>	<p><b>No change.</b> The proposed road access points off Aylesbury Road and Icknield Way (involving ghost island right-turn lane priority junctions) are considered adequate by Hertfordshire County Council as Highway Authority and by the developer's highways consultants. Paragraph 7.6 already states that the precise configuration of the junctions will be determined following advice from the Highway Authority at the planning application stage. The junctions will have sufficient capacity to accommodate the expected traffic flows.</p> <p>The Highway Authority regards the number of access roads as appropriate and that the access into the Gypsy and Traveller site (which would not generate much traffic) will be safe.</p>	<p>No</p>
<p>Highways and access – internal road layout (page 42)</p> <ul style="list-style-type: none"> <li>• Paragraph 5.60: Buses should not be allowed to run through the site – buses would detract from the green space/play area and it is only a short walk to existing bus routes.</li> <li>• Paragraph 5.60: Agree that traffic should not be able to travel right through the site. Measures are needed to ensure that only emergency vehicles and buses can cross the green corridor in the centre of the development.</li> <li>• There should be a traffic calmed through road across LA5, to avoid increased use of Miswell Lane and Christchurch Road.</li> <li>• Paragraphs 5.60 and 5.61: The access roads need to be wide enough to have parked cars and allow emergency vehicles to park.</li> <li>• Sufficient turning space should be provided within the housing development.</li> <li>• There should be a legal block to prevent the existing residential</li> </ul>	<p><b>No change.</b> Paragraphs 5.60-5.62 reflect the views of Hertfordshire County Council as Highway Authority and the developer's highways consultants.</p> <p>A through route between Aylesbury Road and Icknield Way is not favoured, as it would affect the environmental quality of the LA5 housing development and make it less safe. Measures will be introduced to ensure that only emergency vehicles and buses (if any services are provided) can cross the green corridor in the centre of the development.</p> <p>As stated in paragraph 5.61, the access roads will be designed in accordance with the County Council's 'Roads in Hertfordshire' document.</p> <p>Paragraph 5.62 already states that there should be no access from existing roads into the development area. Legal measures are not considered necessary or appropriate.</p>	<p>No</p>

roads being linked with the new development.		
<p>Highways and access – Aylesbury Road and Icknield Way</p> <ul style="list-style-type: none"> <li>Paragraph 5.63: Speed restrictions will be needed on Icknield Way and Aylesbury Road.</li> <li>Footpath improvements and cycleways are needed in Aylesbury Road and Icknield Way.</li> <li>The pavement on the north side of Aylesbury Road should be widened/improved as far west as the site entrance.</li> <li>Safer pedestrian crossing facilities should be provided across Aylesbury Road to the Duckmore Lane allotments and footpaths towards West Leith.</li> <li>The main roads are very busy, but no traffic calming is proposed.</li> <li>A fundamental redesign of Icknield Way is likely to be necessary as far east as the western entrance to the industrial estate and of Aylesbury Road as far east as Donkey Lane.</li> </ul>	<p><b>No change.</b> Paragraph 5.62 already states that the speed limits on Aylesbury Road and Icknield Way should be extended closer to the A41 roundabout and this is shown on Figure 3. Also, paragraph 5.69 indicates that a footpath should be provided along Icknield Way between the northern spine road and Icknield Way Industrial Estate. The need for other measures in Aylesbury Road and Icknield Way, including traffic calming and measures to improve conditions for pedestrians and cyclists, will be considered through the Transport Assessment (see paragraph 5.64) at the planning application stage.</p>	No
<p>Highways and access – footpaths, cycleways and bridleways</p> <ul style="list-style-type: none"> <li>Paragraph 5.67: Donkey Lane is not a good route for a footpath/cycleway as it is not a direct route to local services and is not sufficiently open and visible.</li> <li>Paragraph 5.67: The footpath/cycleway should not follow Donkey Lane, but should be incorporated into the new site entrance from Aylesbury Road.</li> <li>Paragraph 5.67: The appearance of Donkey Lane will be harmed by a concrete/paved footpath and cycleway route.</li> <li>Paragraph 5.67: Measures are needed to prevent vehicles (including cemetery vehicles) from using Donkey Lane.</li> <li>The development will mean more people walking through the existing adjoining housing estate.</li> <li>Cycling should be encouraged.</li> <li>Paragraph 5.70: Bridleways are needed as the main roads are dangerous for horses.</li> </ul>	<p><b>No change.</b> Donkey Lane is proposed as part of the east-west footpath cycleway, because it can provide a safe and attractive route for pedestrians and cyclists. It is a safer option than incorporating the footpath/cycleway into the new site entrance from Aylesbury Road. A footpath/cycleway along Donkey Lane will also reduce the number of pedestrians and cyclists from the LA5 development using the existing nearby residential roads. Some LA5 residents will still use the existing residential roads, but this is not expected to cause serious problems.</p> <p>An attractive and appropriate surface (not concrete) will be chosen for the footpath/cycleway at the implementation stage.</p> <p>The footpath/cycleway will be designed to ensure that it cannot be used by motorised vehicles, except for vehicles that already have existing rights of access along Donkey Lane, including cemetery vehicles.</p> <p>The Draft Master Plan already includes appropriate measures to encourage cycling (see paragraphs 5.5.66 and 5.67). Also, a bridleway is proposed through the western fields from The Holloway to Fox Lane, subject to highway safety issues being resolved (see paragraph 5.70).</p>	No
<p>Highways and access – car parking provision</p> <ul style="list-style-type: none"> <li>Sufficient car parking should be provided.</li> </ul>	<p><b>No change.</b> Parking provision will be required to comply with the Council's parking standards, which are currently as set out in Appendix 5 to the Dacorum Borough Local Plan (see paragraph 2.12 in the Draft Master Plan).</p>	No
<p>Section 6: Concept masterplan (Pages 45-47)</p> <ul style="list-style-type: none"> <li>Locating new housing between two cemeteries is not appropriate.</li> <li>Bullet point 3 under 'constraints' on page 25 seeks retention of views from the site to the Chilterns escarpment, but the Concept Masterplan's proposals will obstruct views from houses in Okeley Lane and from the footpath across the adjacent field.</li> <li>The precise extent of the proposed Travellers' site should be shown.</li> </ul>	<p><b>No change.</b> This is not regarded as a problem by CALA Homes (the developers), particularly as the cemetery extension will be an attractive, well landscaped green space (see paragraph 5.55).</p> <p><b>No change.</b> The text in paragraph 5.48 will ensure that some views from the part of the site to the west of Okeley Lane will be retained.</p>	<p>No</p> <p>No</p> <p>Yes</p>

	<b>Change required.</b> See above response to the proposed Gypsy and Traveller site from organisations.	
<p>Section 7: Delivery (pages 49 &amp; 50)</p> <ul style="list-style-type: none"> <li>• There is a lack of detail.</li> <li>• Paragraph 7.3: There is no justification for allowing development at LA5 before the other local allocations. Without a fuller study into the impact on local services the delivery timetable is not robust.</li> <li>• Paragraph 7.4: The expected length of the construction period seems excessive. It should be reduced if possible to minimise disruption to local residents.</li> </ul>	<p><b>No change.</b> The level of detail is considered to be appropriate for a master plan.</p> <p><b>No change.</b> The delivery timetable is considered to be robust and realistic and has been discussed with the developers (Cala Homes). It is appropriate for a development of this size.</p> <p><b>No change.</b> The Core Strategy envisaged all six Local Allocations being delivered from 2021 onwards. Following further consideration of local housing needs and the role the site will play in delivering other essential local infrastructure, the delivery of Local Allocation LA5: Icknield Way, west of Tring has been brought forward into Part 1 of the Schedule of Housing Proposals and Sites in the Site Allocations document. Whilst no specific delivery date has been set, this will follow the formal release of the site from the Green Belt i.e. after adoption of the Site Allocations DPD. The reasons for this earlier release of LA5 are set out in the Meeting Homes and Community Needs Background Issues Paper (June 2015). They include:</p> <ul style="list-style-type: none"> <li>• the role the site will play in ensuring a robust 5 year housing land supply (for both bricks and mortar homes and Gypsy and Traveller pitches);</li> <li>• the benefits of the early delivery of the extension to the Icknield Way General Employment Area;</li> <li>• the benefits of securing land for an extension to Tring cemetery and associated public open space; and</li> <li>• the lack of any infrastructure capacity issues that require site delivery to be delayed until later in the plan period.</li> </ul> <p>The remaining Local Allocations (i.e. LA1-LA4 and LA6) are included in Part 2 of the Schedule of Housing Proposals and Sites and will bring forward completed homes from 2021 onwards. There have been no significant changes in circumstances since the adoption of the Core Strategy and in consulting on the Site Allocations DPD, to justify bringing forward these allocations sooner. Policy CS3 provides sufficient flexibility for this to happen, if required. No detailed phasing of individual sites is warranted as they vary significantly in size, character, and location, and these factors will naturally regulate their release over time. However, there will need to be a lead in period in order to allow practical delivery from 2021. In practice, this will mean that applications will be received and determined in advance of 2021 and that site construction and works may actually take place ahead of the specified release date to enable occupation of new homes by 2021. This approach is considered to remain appropriate and will ensure that the Council can continue to demonstrate a 5 year housing land supply as required by the NPPF. This approach is consistent with the wording of paragraph 6.28 of the Core Strategy.</p>	No
<ul style="list-style-type: none"> <li>• Concern that developer contributions will be insufficient to provide the necessary improvements to infrastructure – large contributions would be needed for education, highways improvements and healthcare. CALA Homes should be obliged to provide infrastructure improvements.</li> </ul>	<p><b>No change.</b> The Council will seek an appropriate level of contributions through the Community Infrastructure Levy and a Section 106 agreement.</p>	No
<ul style="list-style-type: none"> <li>• Paragraph 7.6: The police should reconsider their decision not to ask for CIL/S106 monies as part of the development.</li> </ul>	<p><b>No change.</b> This is a matter for Hertfordshire Constabulary.</p>	No
<ul style="list-style-type: none"> <li>• Paragraph 7.6: The infrastructure improvements listed are insufficient to mitigate the traffic impact of the development.</li> </ul>	<p><b>No change.</b> Final decisions on what measures are required to mitigate the traffic impact of the development will be taken at the planning application stage and will be informed by the Transport Assessment (see paragraph 5.64).</p>	No
<ul style="list-style-type: none"> <li>• The Infrastructure Report is unintelligible and should be summarised.</li> </ul>	<p><b>No change.</b> By its nature, the Infrastructure Delivery Plan is a technical document. However, the Council has tried to make it as clear and intelligible as possible, whilst still incorporating the appropriate level of detail and technical advice.</p>	No



<ul style="list-style-type: none"> <li>Concern that money raised from LA5 may not be spent on infrastructure in Tring.</li> </ul>	<p><b>No change.</b> In the light of the CIL Regulations 2010 as amended, 15% of CIL money from developments in Tring will go to Tring Town Council to support growth in the town, up to 5% will cover Dacorum's administration costs and the rest will go into Dacorum's central CIL fund. The Borough Council will decide annually how to allocate funds from this pot, based on evidence of infrastructure need across the borough. Infrastructure providers will submit bids for funding.</p>	No
<p><i>Individuals who agreed made the following comments:</i></p>		
<p>Support the principle of development and support the development except for the proposed Gypsy site.</p>	<p><b>No change.</b> Support noted and welcomed.</p>	No
<p>Section 2: Context (pages 3-10)</p> <ul style="list-style-type: none"> <li>Support this section.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	No
<p>Section 3: Analysis of the site (pages 11-22)</p> <ul style="list-style-type: none"> <li>Support this section. Impressed with the level of detail that has gone into this analysis e.g. on enhancing the remaining green space.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	No
<p>Heritage</p> <ul style="list-style-type: none"> <li>Inclusion of Tring Cemetery on the local register of historic parks and gardens is welcomed.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	No
<p>Section 4: Development constraints and opportunities (pages 23-26)</p> <ul style="list-style-type: none"> <li>Support this section.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	No
<p>Homes (pages 28 &amp; 29)</p> <ul style="list-style-type: none"> <li>Paragraph 5.6: Support the proposal for 40% affordable housing, and the 75% rental / 25% shared equity/shared ownership split.</li> <li>Paragraph 5.6: Accept the need for some affordable housing.</li> <li>Paragraph 5.10: Support the requirement that affordable homes should be indistinguishable from market housing.</li> <li>Paragraphs 5.11-5.17: Support the proposed Gypsy site (and would like to live there along with relatives). The proposed location is ideal, with good proximity to local services. Hertfordshire County Council has no vacancies on its sites and the waiting list is very long. The Long Marston site cannot be extended because of an agreement with residents.</li> <li>Paragraph 5.14: Five plots is a good size for the Gypsy site and the design should prevent future expansion. Amenity blocks with bathroom/kitchen should be provided. There should be high fences between plots for privacy and wooden fencing around the site is better than metal..</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>
<p>Employment area extension (page 30)</p>		No

<ul style="list-style-type: none"> <li>• Support the employment area extension. It will enable firms to relocate from the Tring Triangle, thus releasing these brownfield sites for housing.</li> <li>• There is a case for making the employment area extension larger.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed. The balance between employment space and homes space is considered appropriate. See response above.</p>	No
<p>Design (pages 31-33)</p> <ul style="list-style-type: none"> <li>• Support all the design principles.</li> <li>• Agree that development should blend into the area. Hampden Hall in Aylesbury is a good local example of how to do this.</li> <li>• Security should be achieved through communal dwellings with overlooked shared space and play areas.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Noted. See paragraph 5.23.</p>	No No No
<p>Green space (pages 34 &amp; 35)</p> <ul style="list-style-type: none"> <li>• Support the green space principles. Planning applications should adhere to these principles.</li> <li>• Support the proposals for separate play areas for younger and older children. The play area for small children should be as large and interesting as possible – Aston Clinton Park play area is a good example.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p>	No No
<p>Landscape (pages 36-39)</p> <ul style="list-style-type: none"> <li>• Support the landscape principles.</li> <li>• Sympathetic and high quality treatment of footpaths and cycle routes is essential, particularly Donkey Lane.</li> <li>• Paragraph 5.42: Existing hedges should be enhanced and new ones planted.</li> <li>• Paragraph 5.45: Support for wildlife habits provision.</li> <li>• The A41 roundabout should be landscaped with wildflowers (not trees or shrubs).</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Support noted and welcomed.</p> <p><b>No change.</b> Noted. This is a matter for Hertfordshire County Council, as the local Highway Authority.</p>	No No No No No
<p>Cemetery extension (pages 39-40)</p> <ul style="list-style-type: none"> <li>• Support the proposed cemetery extension.</li> <li>• Paragraph 5.51: Support the inclusion of green burials in the cemetery extension.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	No
<p>Utilities and services (page 41)</p> <ul style="list-style-type: none"> <li>• Support the principles.</li> </ul>	<p><b>No change.</b> Support noted and welcomed.</p>	No

Highways and access (pages 41-43)	<b>No change.</b> Support noted and welcomed.	No
<ul style="list-style-type: none"> <li>Paragraph 5.62: Agree that there should be no access into the site from the existing residential area.</li> <li>Paragraphs 5.63-5.67 and 5.69: Support these paragraphs.</li> <li>Paragraph 5.67: Support extending the footpath from Donkey Lane.</li> <li>Paragraph 5.67: Support the link from the footpath/cycleway to Beaconsfield Road and Highfield Road.</li> <li>Support the proposed bridleways and cycleways.</li> </ul>		
Section 7: Delivery (pages 49 & 50)	<b>No change.</b> Noted. This will be achieved through the planning application process.	No
<ul style="list-style-type: none"> <li>There should be a guarantee that the cycle paths, and play areas actually happen.</li> <li>Paragraphs 7.3 and 7.4: Support new housing and employment development, with development taking place at an early date.</li> </ul>	<b>No change.</b> Support noted and welcomed.	No
<b>Landowners</b>		
<i>Landowners who disagreed made the following comments:</i>		
Cemetery extension principles (pages 39-40)	<b>No change.</b> The Council considers that it is desirable that the telephone repeater site is incorporated into the cemetery car park. This will help to ensure that an attractive, well landscaped car park can be provided. However, the telephone repeater site is very small. Therefore, if the Council is unable to reach an agreement with the owner to acquire the site, it will not greatly affect the design of the cemetery car park.	No
<ul style="list-style-type: none"> <li>Paragraph 5.54: The telephone repeater site should be excluded from the proposed cemetery car park.</li> </ul>		
Section 6: Concept masterplan (Pages 45-47)	<b>No change.</b> The Council is very doubtful that a house that accords with the Draft Master Plan can be accommodated on this very small site. If the landowner thinks otherwise, this can be tested by submitting a planning application.	No
<ul style="list-style-type: none"> <li>The Concept Masterplan should allocate the telephone repeater site on Aylesbury Road for residential development, to accommodate one house.</li> </ul>		
<i>Landowners who agreed made the following comments:</i>		
-		

<b>ISSUE: Master Plan: Local Allocation LA6</b>		
<b>Number of people/organisations responding    7</b>		
<b>Supporting -</b>		
Key organisations	1	
Individuals	0	
Landowners	0	
<b>Total</b>	<b>1</b>	
<b>Objecting -</b>		
Key organisations	2	

Individuals	4
Landowners	0
<b>Total</b>	<b>6</b>

**NOTE. Some local residents wishing to raise concerns regarding the LA6 development did so by responding to the consultation on Policy LA6 of the Pre-Submission Site Allocations document, which ran in parallel to that for the master plans. Please refer to separate Report of Representations for a summary of issues raised and the Council's response.**

**NOTE: Paragraph numbers referred to in the responses below relate to those of the September 2014 version of the master plan for LA6.**

Issue	Response	Amendment required – yes or no
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**Organisations**

*Organisations who disagreed made the following comments:*

<p>Environment Agency – Planning Specialist:</p> <ul style="list-style-type: none"> <li>• Development should not further contaminate groundwater (SPZ3).</li> <li>• Ensure that flood risk is not increased on or off site and greenfield run-off rates are achieved.</li> <li>• Sufficient open space should be allocated on the Master plan for variety of sustainable drainage features.</li> <li>• Inclusion of informal open spaces within site layout to encourage wildlife.</li> <li>• Clarification on whether the development will be connected to a private foul and surface water pipe maintained by MoJ <b>or</b> connect elsewhere directly to public sewer network.</li> <li>• Water efficiency measures such as low/dual flush toilets, low flow/aerated taps and showerheads, and efficient appliances should be incorporated into the housing design.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Change required</b> – Although matters relating to the sufficiency of contamination and flood risk remediation/mitigation measures will be dealt with during the development management process (as informed by appropriate assessments), it is helpful to note in the master plan that the site lies within a Source Protection Zone 3 (SPZ3) and the need to safeguard against any further groundwater contamination. The site is located within the Environment Agency's Flood Risk Zone 1 in terms of fluvial flood risk and a small part of the site is at a low risk of surface water flooding. The topography of the site and presence of the balancing pond also lends itself to ensure any surface water drains toward the pond which acts as storage during any extreme rainfall events. Nevertheless, the developer/applicant will be required to submit appropriate assessments for consideration at the planning application stage and, if planning permission is granted, recommended and approved mitigation measures will be conditioned to ensure they are implemented and maintained.</li> <li>• <b>No change</b> – As set out on the indicative site layout plan contained within the Master Plan, the area around the existing balancing pond (as currently fenced in) will be excluded from the developable area and can therefore incorporate appropriate SuDS features where technically feasible. This will assist the developer in designing the site to ensure that greenfield run-off rates are achieved so that any flood to residential properties (if present) is minimised or eliminated. However, following legislative changes to the way in which SuDS will be approved (Flood Water Management Act 2010), the Master Plan should be amended accordingly to advise of the Local Planning Authority's role and the role of the Lead Local Flood Authority. This should reflect proposed change MC39 to the Site Allocations DPD.</li> <li>• <b>No change</b> – The Master Plan includes provision of open space within the site and this was seen as a key driver in the design process. Whilst this open space area is intended to be more formalised (with a play area for children and possibly seating to ensure appropriate surveillance), the proposal would also include retention (where possible) and enhancement of the naturally vegetated boundaries. This could include buffer strips along these boundaries to facilitate wildlife and natural plant succession. The density of the proposed housing development would also be relatively low (approximately 23 dwellings per hectare) allowing for the inclusion of sufficient space between properties/blocks of properties and creating a degree of openness within the site. All of these matters will be further developed at the planning application stage.</li> <li>• <b>Change required</b> – Details of foul and surface water connections will be set out at a later stage in the planning process. The physical connection works are instead governed by the Water Industry Act 1991 rather than through the planning system. However, through consultation on the Pre-submission Site Allocations DPD, Thames Water have advised of likelihood of infrastructure works and therefore the need for developers of LA6 to prepare a Drainage Strategy ahead of any planning application to ascertain what (if any) infrastructure upgrades would be required prior to occupation of the development. This will also identify how the development will be connected to existing drainage networks. The master plan document should be amended accordingly to clarify this requirement and to align with proposed change MC38 in the Site Allocations DPD. The issue of sewer infrastructure capacity was previously raised through consultation on the Pre-submission Site Allocations DPD and those representations have been considered by the Council. These are specifically addressed under Chapter 18 responses and responses to the six respective local allocation policies. The Council's responses and any corresponding changes to the Site Allocations document are set out within the Council's Site Allocations Report of Representations 2015</li> </ul>	<p>Yes</p>
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	<p>(Part 2) (<a href="http://www.dacorum.gov.uk/home/council-democracy/meetings-minutes-and-agendas/events/2015/07/21/cabinet/cabinet">http://www.dacorum.gov.uk/home/council-democracy/meetings-minutes-and-agendas/events/2015/07/21/cabinet/cabinet</a>).</p> <ul style="list-style-type: none"> <li>• <b>No change</b> – The developer will be required to demonstrate compliance with Core Strategy Policy CS29 (specifically part (b) in regard to the consumption of water resources during construction and part (e) to limit residential water consumption to 105 litres per person per day) and in doing so they will be expected to submit a Sustainability Statement and carbon compliance checklist in support of any planning application for the development of LA1 (paragraph 18.22 of the Core Strategy). This will be assessed at the planning application stage and the Environment Agency will be consulted during that process. Additionally, details regarding the implementation of home-specific water efficiency measures will be the subject of regulations outside of the town and country planning remit. Specifically, following withdrawal of the Code for Sustainable Homes, the developer will be required demonstrate compliance with the Building Regulations 1984 (as amended) which now includes a need to ensure the provisions for renewable energy, water efficiency measures and off-site carbon abatement measures for developments of 10 units or more (as inserted following enactment of the Infrastructure Act 2015).</li> </ul>	
<p>The Mount Residents Association:</p> <ul style="list-style-type: none"> <li>• Development principles state a mixture of 2- and 3-storey housing will be provided. Elsewhere the Master Plan states only 2. No 3-storey houses within surrounding estates.</li> <li>• Diagram fails to show three areas of amenity green space previously highlighted in Dacorum’s Green Space Strategy (2011).</li> <li>• New green/open space will not benefit existing residents of Mitchell Close. This should be provided between existing properties on Mitchell Close and proposed houses as an appropriate means of integration.</li> <li>• No evidence of sustainable travel to the village centre. Box Lane requires a shared walking and cycle track. Any contributions (CIL or S106) should be available for this.</li> <li>• Layout does not integrate with character and street pattern of neighbouring sites. E.g. Mitchell Close, Lysander Close and Lancaster Road have back gardens facing onto either other back gardens or open/green amenity spaces.</li> <li>• The public open space should be located between Mitchell Close and house on LA6 to prevent blank facades backing onto existing gardens.</li> <li>• Concern that the visual impact on Mitchell Close has been overlooked with proposed facades backing onto gardens, proposed urban design boundary treatments not considered adequate and therefore the new green space should be located here. As currently proposed, the green space will not benefit the residents of Mitchell Close.</li> <li>• No bus stop on Chesham Road – School pupils walk to bus stop on Molyneaux Avenue.</li> <li>• Pedestrian links between the site and Hyde Lane and out onto Chesham Road required to encourage walking into the village.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Change required</b> – To reflect Policy LA6 in the Site Allocations document, a correction is necessary to reflect the Homes Principles (page 23) and Layout and Design Principles (page 24) which state that new homes should be limited to two storeys due to height restrictions associated with the nearby NATS beacon (paragraph 5.11). Also, the development should seek to reflect the character of the local area and in particular the surrounding residential character (as referred to in paragraphs 2.24 and 2.26).</li> <li>• <b>No change</b> – The Bovingdon Open Space plan on page 129 of the Green Space Strategy 2011-2016 identifies a number of open spaces within Bovingdon including amenity green space, churchyards and playing fields. The omitted area referred to by the representor is an area of identified as ‘natural green space’ (rather than amenity green space) around Anson Close and the prison’s southern perimeter. Having considered the matter in discussion with the landowner, Ministry of Justice, it would not be appropriate to facilitate recreational access within this identified natural green space for security reasons.</li> <li>• <b>No change</b> – The proposed open space within LA6 is intended to enable access to all members of the public and will therefore benefit anyone who chooses to use it.</li> <li>• <b>No change</b> – The proposed development at LA6 is unlikely to materially increase the volume of traffic travelling along Box Lane. This view is supported by Hertfordshire County Council as the Local Highway Authority who support the proposed local allocation (see comments below). Box Lane/Chesham Road is a main route from Chesham and Bovingdon to Hemel Hempstead which already experiences congestion during peak times. The Council would not be able to seek financial contributions from the developer to be used in connection with any such off-site highway works (as suggested) particularly where: there is no evidence to demonstrate that the proposed development at LA6 would have a direct, significant impact on the highway network capacity; and the Local Highway Authority have not identified any planned highway improvement works along Box Lane through the Infrastructure Delivery Plan (updated 2015) or as a project on the Community Infrastructure Levy (CIL) Regulation 123 List.</li> <li>• <b>No change</b> – Figure 6 of the master plan is an indicative spatial layout showing the <i>potential</i> configuration of houses. Therefore, this is not the final layout plan (which will be developed ahead of any planning application) and these comments can be taken on board to inform the layout of the site in terms of housing and garden orientations and location the public open space. Furthermore, any planning application will be judged against relevant national and local planning policies relating to design and amenity impacts, including Core Strategy Policies CS10, CS11 and CS12, which require development to avoid visual intrusion (amongst other requirements).</li> </ul>	<p>Yes</p>

	<ul style="list-style-type: none"> <li>• <b>Change required</b> – Correction required regarding erroneous statement that a bus stop exists on Chesham Road. There is a bus stop on Molyneaux Avenue, which is used by service numbers <b>730</b> (353 Sunday), <b>850/851</b> (school service), and none located on Chesham Road.</li> <li>• <b>No change</b> – The master plan does incorporate the proposed provision of pedestrian links between the site and Mitchell Close, Hyde Lane and Molyneaux Avenue.</li> </ul>	
<i>Organisations who agreed made the following comments:</i>		
Hertfordshire County Council – Highways:  The Highway Authority have been closely involved in the drawing up of the master plans for these sites and supports the proposals for supporting infrastructure identified therein.	<b>No changes</b>  Support noted.	No
<b>Individuals</b>		
<i>Individuals who disagreed made the following comments:</i>		
Whiteacre Ltd: <ul style="list-style-type: none"> <li>• Does not set out full adopted requirements of Core Strategy for Bovingdon – less than half number of homes required.</li> <li>• No analysis of other sites.</li> <li>• Layout is only block plan.</li> <li>• No root protection zones or tree plans provided – would reduce developable area.</li> <li>• No provision of new open space.</li> <li>• Impact of prison expansion on parking and congestion.</li> <li>• No information on infrastructure.</li> </ul>	<b>No changes</b> <ul style="list-style-type: none"> <li>• <b>No change</b> – Issues regarding the provision of 60 homes, analysis of alternative local allocations, infrastructure and car parking need for the prison expansion have been previously addressed in response to the principle of LA6 within the Site Allocations responses. The Council’s Report of Representations 2015 (Part 2) summarises these responses and is available to view on the website: <a href="http://www.dacorum.gov.uk/home/council-democracy/meetings-minutes-and-agendas/events/2015/07/21/cabinet/cabinet">http://www.dacorum.gov.uk/home/council-democracy/meetings-minutes-and-agendas/events/2015/07/21/cabinet/cabinet</a>.</li> <li>• <b>No change</b> – In regard to the current block plan layout, this will be further developed through the planning process in preparation for submitting an application to the Council. This will include a detailed layout plan identifying location and orientation of dwelling units, garden spaces, open space (as identified currently within the Draft Master Plan document) and car parking (for example).</li> <li>• <b>No change</b> – The surveying of trees, identification of root protection zones and implementation of mitigation measures to safeguard trees of value will be considered through the development management process when a planning application is prepared and submitted to the Council. The master planning process to date has incorporated consideration of the existing vegetation and capacity to accommodate 60 dwellings. Whilst the site is well screened with mature trees, shrub and hedgerows, any trees lost through the development process can be replaced with new planting through an appropriate planning condition(s).</li> <li>• <b>No change</b> – The proposed development at LA6 includes the provision of public open space within the site. This is indicated on the indicative site layout plan and is mainly focused around the existing balancing pond. As aforementioned, this was seen as a key driver in the design process and, whilst this open space area is intended to be more formalised (with a play area for children and possibly seating to ensure appropriate surveillance), it would also serve to enhance local biodiversity and enable the provision of appropriate SuDS features.</li> <li>• <b>No change</b> – Planning permission for the expansion of HMP The Mount prison, including the provision of 80 additional car parking spaces, was granted by the Council in March 2013 (4/01994/12/MFA). As advised by the landowner and operator of the prison (Ministry of Justice), the site now known as LA6 is not required in connection with the prison expansion and development of the site will not impact upon operation of the prison.</li> </ul>	No



	<ul style="list-style-type: none"> <li><b>No change</b> – As part of preparing its plan for the scale and location of new development in the Borough, the Council has prepared an Infrastructure Delivery Plan (InDP). The InDP provides information on a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers. Information regarding doctors' surgeries was provided by the Clinical Commissioning Group and information about school capacities has been provided by Hertfordshire County Council as Local Education Authority, for example. The InDP is updated annually and work on the most recent update (June 2015) was scheduled to take account of representations received following consultation on the Pre-submission Site Allocations DPD and associated master plans in late 2014. This update addresses key infrastructure concerns raised by providers and, where appropriate, amendments will be made to the draft master plans where appropriate to ensure these are properly addressed. Specific issues raised relating to individual sites is addressed under the relevant Local Allocation. This revised version of the InDP will accompany the submission version of the Site Allocations DPD.</li> </ul>	
<p>Jenny Summerfield:</p> <ul style="list-style-type: none"> <li>No outright objections to the need for 130 new homes between now and 2031 or provision of 60 homes off Molyneaux Avenue.</li> <li>Concerned by Taylor Wimpey's proposal to construct 130-300 homes on land to the rear of Homefield and Yew Tree Drive for the following reasons: green belt, traffic impact/congestion, impact on the Conservation Area and protection of villages rural edges.</li> </ul>	<p><b>No change</b></p> <ul style="list-style-type: none"> <li><b>No change</b> – The Council does not currently support this proposal rumoured to the rear of Homefield and Yew Close as part of the Pre-submission Site Allocations DPD. Residents had been alerted to a developer's interest in this site through a local leafleting campaign and in response to this a clarification statement was published on the Council's website: <a href="http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/site-allocations-2014">http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/site-allocations-2014</a>.</li> </ul>	No
<p>Peter Summerfield:</p> <ul style="list-style-type: none"> <li>No outright objections to the need for 130 new homes between now and 2031 or provision of 60 homes off Molyneaux Avenue.</li> <li>Concerned by Taylor Wimpey's proposal to construct 130-300 homes on land to the rear of Homefield and Yew Tree Drive for the following reasons: green belt, traffic impact/congestion, impact on the Conservation Area and protection of villages rural edges.</li> </ul>	<p><b>No change</b></p> <p>Response as above.</p>	No
<p>Mr &amp; Mrs Stewart:</p> <ul style="list-style-type: none"> <li>Loss of light, overlooking and disturbance through noise and street lighting due to proposed site layout. There should be open/green space or another garden backing onto our garden fence line.</li> </ul>	<p><b>No change</b></p> <ul style="list-style-type: none"> <li><b>No change</b> – Figure 6 of the master plan is an indicative spatial layout showing the <i>potential</i> configuration of houses. Therefore, this is not the final layout plan (which will be developed ahead of the planning application) and these comments can be taken on board to inform the layout of the site in terms of housing and garden orientations and location the public open space.</li> </ul>	No
<b>Landowners</b>		
<i>Landowners who disagreed made the following comments:</i>		
<i>Landowners who agreed made the following comments:</i>		
<i>Other comments from Landowners:</i>		



<b>Other new sites and/or designations</b> <ul style="list-style-type: none"><li>• Grange Farm, Bovingdon.</li></ul>		
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# MAP AMENDMENTS:

## LA5

Figure 1: Local Allocation LA5 and existing cemetery – new map

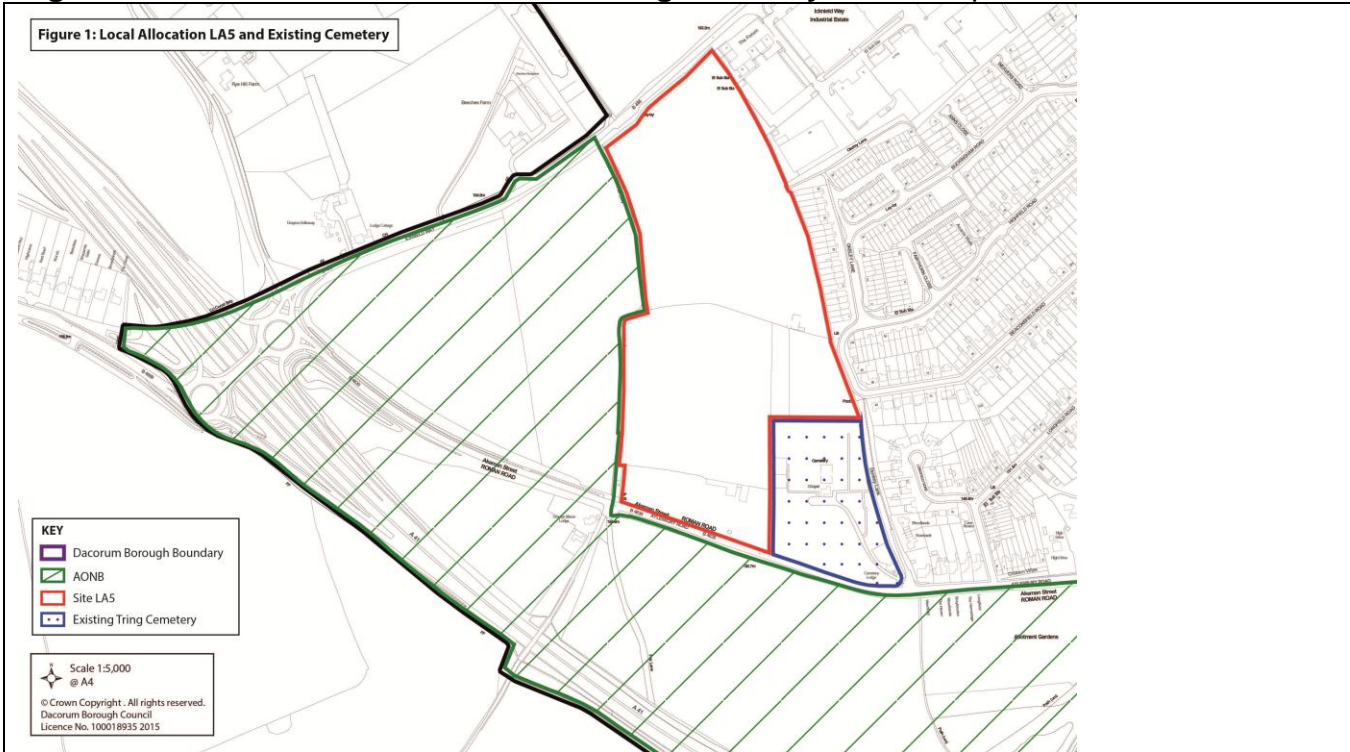
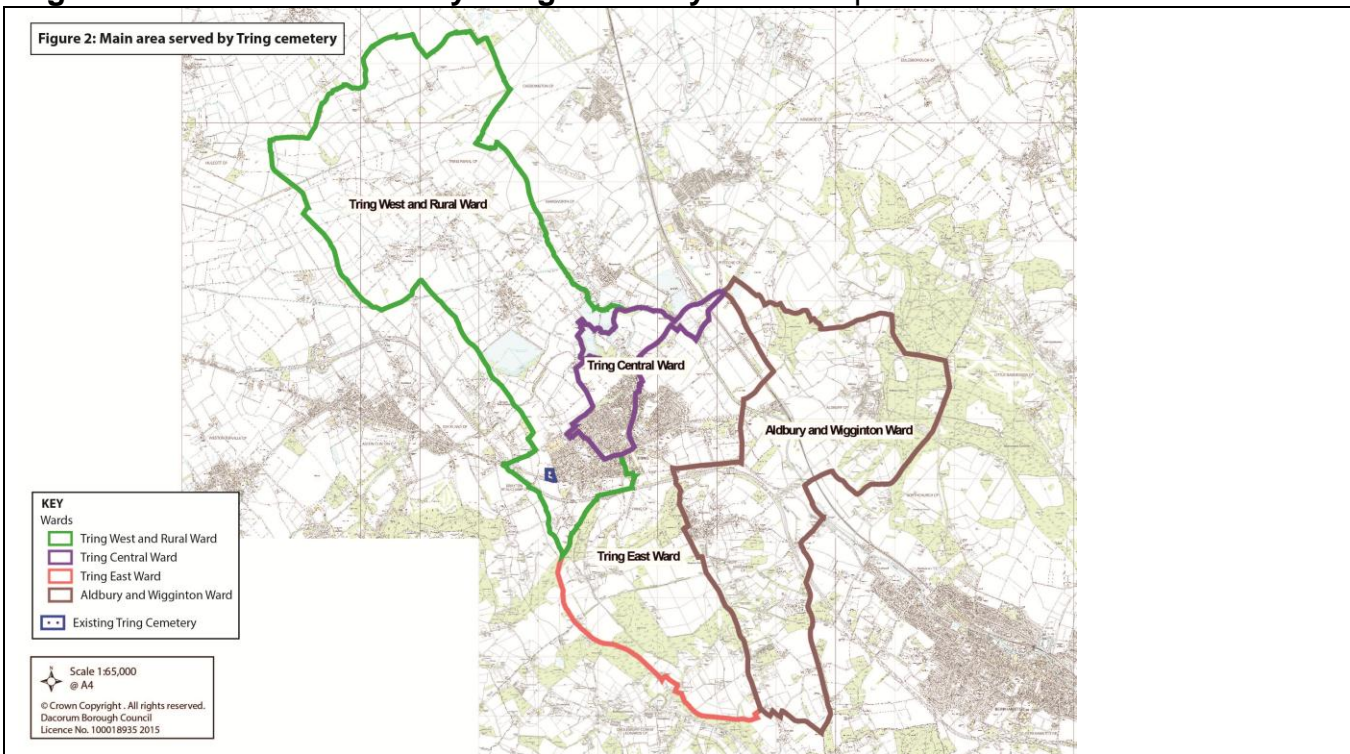
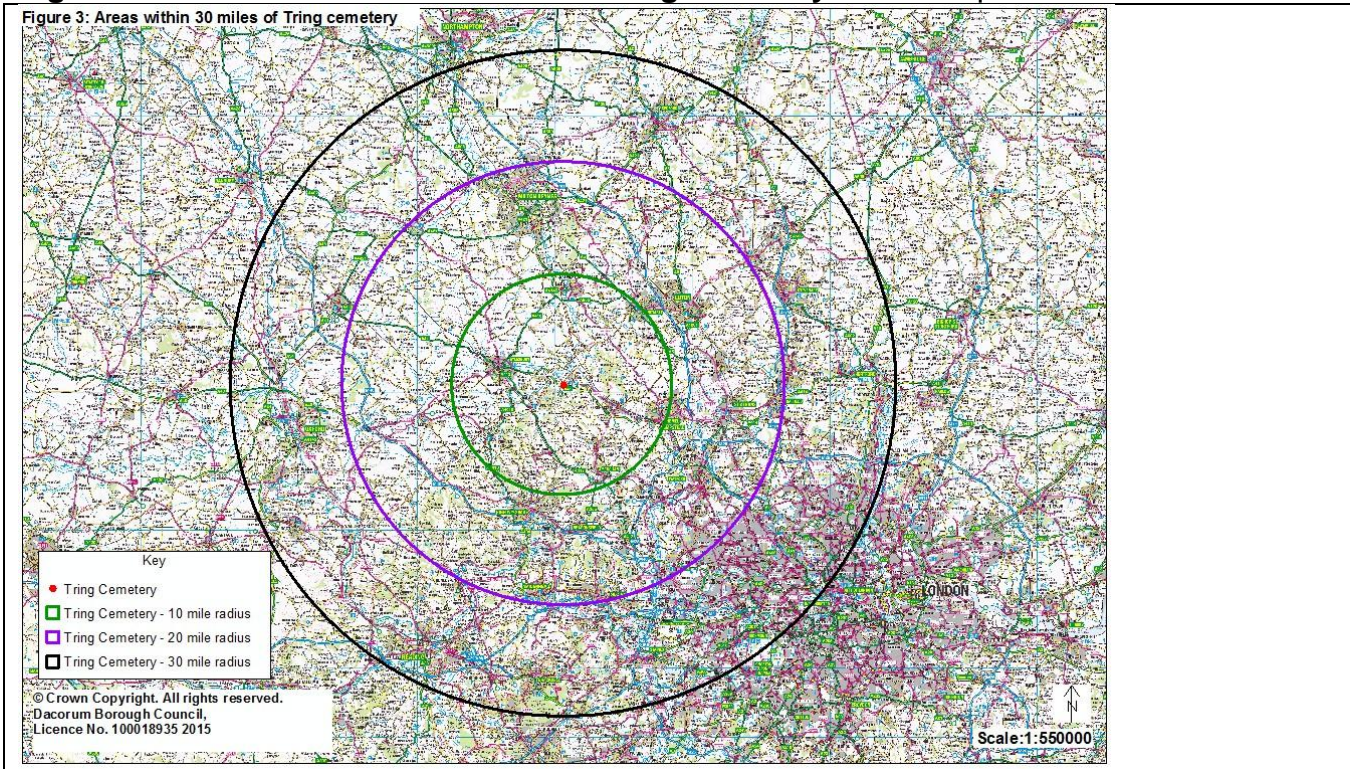


Figure 2: Main area served by Tring cemetery – new map



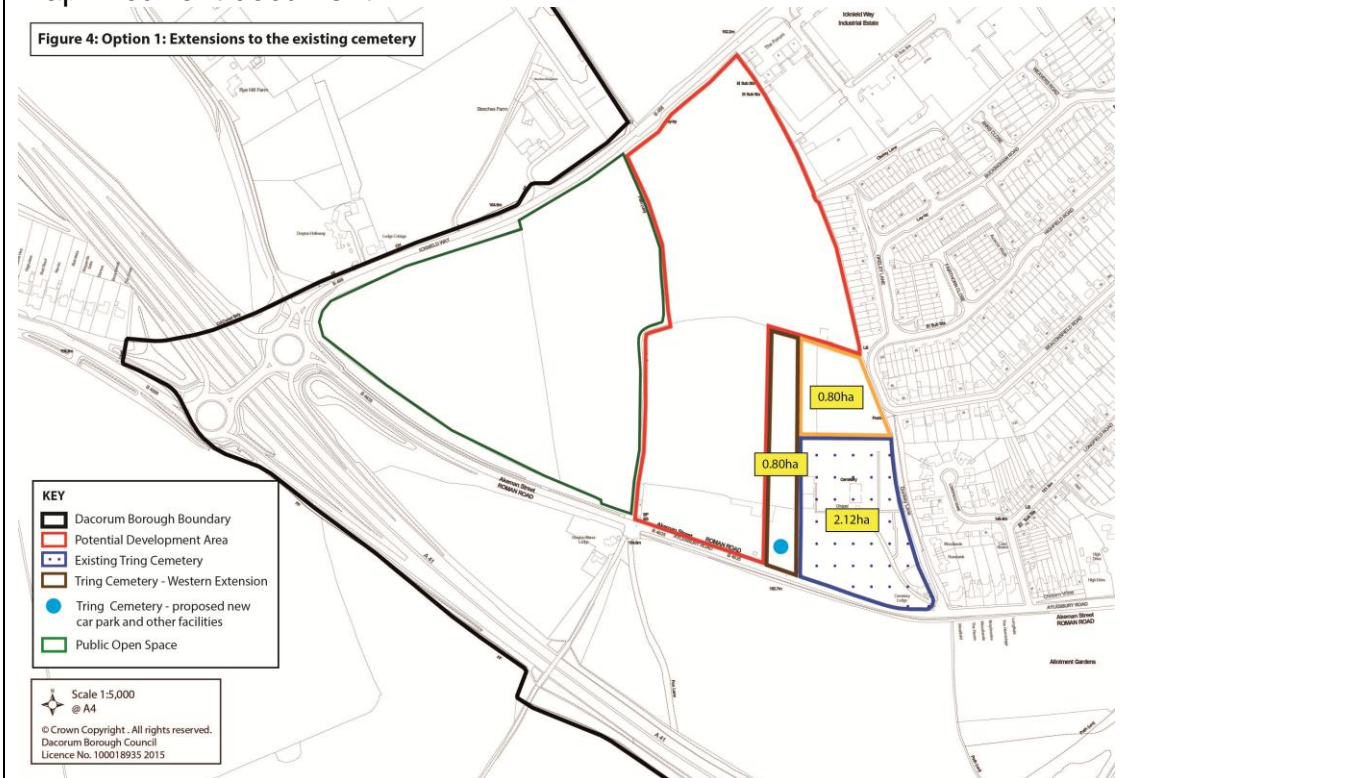


**Figure 3: LA5 areas within 30 miles of Tring cemetery – new map**



**Figure 4: Extensions to the existing cemetery – new map**

Map in current document:



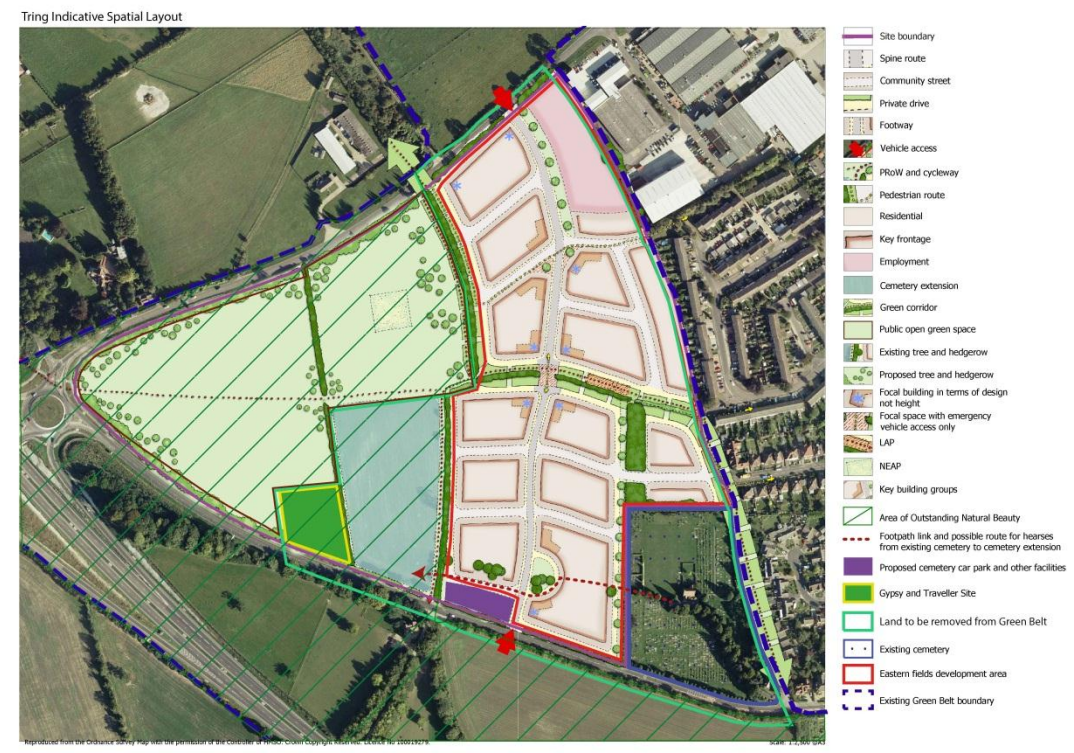


**Figure 5: Concept Master Plan Option 2**

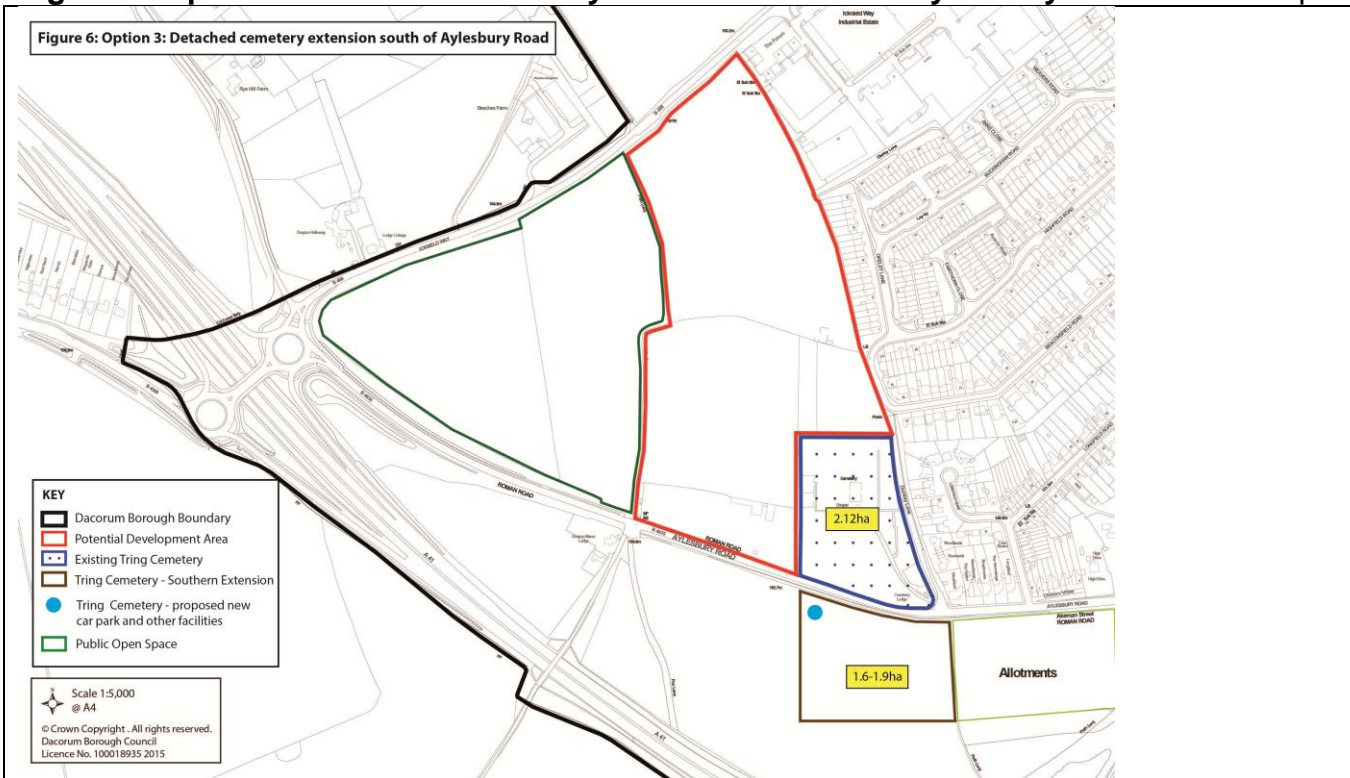
Map in current document:



Amended map:



**Figure 6: Option 3: Detached cemetery extension south of Aylesbury Road – new map**



**Table 5 – Responses not considered in the Report of Representations**

**List of those making No Comment**