



# **Dacorum Site Allocations Development Plan Document**

Sustainability Report Addendum

May 2016

PROJECT REPORT: CPR2237

Dacorum Site Allocations Development Plan Document

Sustainability Appraisal Report Addendum

May 2016

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# 1 Introduction

## 1.1 Background

This document is an Addendum to the Sustainability Appraisal (SA) Report (September 2014) (Examination document SUB20) that was prepared to accompany the Publication of the Dacorum Site Allocations Development Plan Document (DPD).

The purpose of the Addendum is to provide information in relation to how alternatives were considered during the development of the Site Allocations DPD, and in particular to pull together within a single document certain information previously reported in various SA Working Notes. The Addendum also provides clarification in relation to some other issues that were raised in correspondence from the Inspector (Examination documents PC3a and PC3b).

This Addendum does not add any new assessment or findings to those previously published in the SA documents that have been produced at previous SA stages, but provides a fuller explanation of the process undertaken, the sites considered at each stage, the reasons why certain sites were discounted and the pivotal role the Core Strategy played in determining what were 'reasonable alternatives' at different stages in the plan-making process. In addition, the Addendum provides an explanation of the relationship between the Core Strategy and the Site Allocations DPD in order to clarify the approach taken when undertaking the SA.

This Addendum should be read alongside the SA Report (September 2014), the SA Report Addendum (July 2015) (Examination document SUB13); and the SA Submission Statement (January 2016) (Examination document SUB5).

# 2 Consideration of Alternatives

## 2.1 Introduction

Government guidance for SA of Local Plans<sup>1</sup> states that:

*"it is the role of the SA Report to outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives".*

However it should be noted that it is the plan making authority which is the primary decision-maker in relation to identifying what is to be regarded as a 'reasonable alternative'.

The SA Report (September 2014) provided information on how options had been considered during the development of the Site Allocations DPD. However it was not always explicit in explaining why options had been selected, rejected or taken forward, and did not provide information on how the context for the consideration of alternatives changed following the adoption of the Dacorum Core Strategy. This latter point is of particular relevance in the context of the Inspector's queries as to how sites options for Gypsy and Traveller sites have been considered.

This Addendum is therefore designed to supplement the information included in Section 5 of the SA Report (September 2014) in order to provide a fuller explanation of how alternatives were considered during the development of the Site Allocations DPD. It also reproduces the information on the selection and rejection of site options that was included in the SA Working Notes of December 2006, October 2008 and May 2014.

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<sup>1</sup> National Planning Practice Guidance

The content of these Working Notes was summarised in Section 5 of the SA Report (September 2014). However that relied on cross-referencing to the Working Notes in relation to the detail for individual sites. That reliance on cross-referencing, and the associated ‘paper chase’ has been rectified by providing the detail in appendices to this Addendum, which forms part of the SA Report for Examination.

## 2.2 Link to the Core Strategy Sustainability Appraisal

The Council’s approach to SA has been integrated into the plan-making process for both the Development Plan Documents prepared as part of the Local Development Framework. This process was initiated through the preparation and consultation on an SEA and SA Scoping Report (Examination Document CS39) in February 2006 and has played an important role in all subsequent planning stages. There has been close liaison with the Council to ensure the process is robust, comprehensive and iterative.

For the Core Strategy the SA provided assessments of all the reasonable alternatives that were considered. On adoption in September 2013 the Core Strategy (Examination Document CS4) was accompanied by an SA Adoption Statement (Examination Document CS3) which provided information, inter alia, on the reasons why the adopted Core Strategy was chosen in light of these alternatives.

The sustainability appraisal undertaken on the Core Strategy is relevant to the Site Allocations DPD for the following two reasons:

### *a) Relationship of Core Strategy and Site Allocations DPDs:*

The Site Allocations DPD is not a stand-alone Local Plan, but a ‘daughter document’ to the adopted Core Strategy. As such it is appropriate for certain matters to be assessed in the SA of the Core Strategy and not duplicated in the SA of the Site Allocations DPD<sup>2</sup>. The Core Strategy identifies the areas of the Borough in which new development will be concentrated and those where development will be constrained. The Core Strategy policies also provide the framework for the identification and allocation of development sites. As examples:

- Policy CS2 provides criteria for the selection of development sites;
- Policy CS5 deals with development in the Green Belt;
- Policy CS24 covers the Chilterns AONB; and
- Policy CS27 provides the strategy for conserving and enhancing the historic environment.

The overarching strategy and policies in the Core Strategy were subject to sustainability appraisal at several stages, including:

- Core Strategy Issues and Options (two consultations in 2006) (Examination Documents CS35 and CS38);
- Emerging Core Strategy (2009) (Examination Document CS32);
- Draft Core Strategy (2010) (Examination Document CS24);
- Publication (2011), Submission (2012) (Examination Documents CS22 and CS15 respectively); and
- Main Modifications (2013) (Examination Document CS8).

During this ongoing process a range of options were considered and, where appropriate, subject to SA. At each stage the findings of the SA were documented in a published report. The SA Adoption Statement (October 2013) (Examination Document CS3) provides summarises this entire process.

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<sup>2</sup> See Regulation 12(d) of The Environmental Assessment of Plans and Programmes Regulations 2004

The consideration of Issues and Options for the Core Strategy was supplemented by the consideration of Issues and Options for the Site Allocations DPD. This covered topics including: settlement strategy; housing; employment; retailing; transport infrastructure; community development; leisure and recreation; landscape, biodiversity and historic heritage; and design.

The SA undertaken for the Site Allocations Issues and Options (SA Working Note, December 2006) (Examination Document SA16) considered the implications on sustainability of the various issues raised and questions posed.

#### *b) Selection and Delivery of Local Allocations:*

The Local Allocations (LA1-LA6) that are included in the Site Allocations DPD were established in the adopted Core Strategy and it was during the development of the Core Strategy that reasonable alternative sites for the Local Allocations were considered and the process documented in the SA Report for the Core Strategy (Examination Document CS22). This work is covered in detail through the Compendium of Sustainability Appraisal Assessments of Potential Strategic Site and Local Allocations by Settlement (June 2012) (Examination Document CS11).

## **2.3 SA of Site Allocations DPD**

### *2.3.1 Introduction*

With regards to the Site Allocations process itself, work on the Site Allocations DPD initially began alongside the Core Strategy, with Issues and Options consultation held in 2006 and 2008 (Examination Documents SA18 and SA11). Both consultations were accompanied by SA Working Notes (Examination Document SA16 and SA14 respectively), which linked to the 2006 and 2008 Schedule of Site Appraisals (Examination Documents SA19 and SA13).

Reasonable alternatives were appraised at each stage of document preparation, as explained in more detail below. This assessment was undertaken in parallel with the Council's Schedules of Site Appraisals published in 2006, 2008 and 2014 (Examination Documents SA19, SA13 and SA20 respectively). These assessed a range of possible allocations and incorporated sites put forward directly by landowners together with those identified through the Council's own technical work (i.e. the Strategic Housing Land Availability Assessment (SHLAA)).

### *2.3.2 Influence of the Core Strategy*

The process of developing the Site Allocations DPD and the relationship with the Core Strategy is summarised in Figure 1. This diagram shows how the work on the Site Allocations DPD was put on hold during the development of the Core Strategy, and how the Core Strategy, once adopted, provided a different 'planning landscape' in which the Site Allocations DPD was further developed. In other words the Core Strategy created a clear and logical distinction between those sites considered to be 'reasonable alternatives' *before* the adoption of the Core Strategy, and those *after*.

This meant that some sites which may originally have been considered as 'reasonable alternatives' for allocation, could no longer be considered as such, this being particularly the case for Gypsy and Traveller Sites (see Section 2.3.4). However it did not result in the opposite effect, i.e. of making some sites that were previously rejected now being considered as reasonable, as those reasons for earlier rejection remained valid under the Core Strategy.

### *2.3.3 Approach to the Sustainability Appraisal*

Given the role of the Site Allocations DPD as a delivery vehicle for the Core Strategy, (i.e. as a schedule of sites to help deliver the growth levels set by the Core Strategy), it was necessary to take a slightly

different approach to the SA of the Site Allocations DPD than for the Core Strategy itself. This was in order to avoid duplication of effort between the plan-making process and the SA process when considering the long list(s) of potential site allocations, given the overlap in criteria used in the SA and the Council's own assessment process used in the Schedules of Site Appraisals.

As described in paragraph 5.2.1 of the SA Report for the Site Allocations DPD (Examination Document SUB20) the SA assessed the draft appraisal methodology used by the Council when initially assessing sites through the Schedule of Site Appraisals. This ensured that the methodology used by the Council was aligned with the SA Framework at a level appropriate to the early consideration of site options. Despite having been developed in advance of the PAS guidance<sup>3</sup>, the methodology used for filtering site options complies with this good practice. It used a range of criteria relating to environmental designations, other land use designations and land ownership information to progressively filter sites to develop a shortlist of reasonable site options. This approach demonstrates the close and iterative approach the Council and its consultants have taken to developing the plan. The use of shared evidence between plan preparation and the SA process is supported by the PAS guidance and avoids unnecessary duplication of work between the plan making and SA activities.

The methodology used at this stage in the SAs themselves was to screen the sites against a series of Key Environmental Designations (see Appendix A of SA Working Note on Initial Issues and Options (Examination Document SA16)). The same methodology was used in subsequent site appraisal stages in 2008 and 2014.

The SA then assessed the Council's sustainability conclusions reached for each of the proposed sites within the Schedule of Site Appraisals, and made recommendations as to whether sites should be progressed or not to the Preferred Options stage. In accordance with guidance, all the sites were dealt with by the SA at the same level of detail at each stage when considering which sites should be taken forward into the final plan.

As part of this 'site sieving' process the Council dismissed a large number of sites that could not be considered as 'reasonable alternatives' due to a range of 'exclusionary criteria' (e.g. location in the Green Belt, in flood zone, in AONB). The reasons for not taking sites forward are summarised in the extracts from the three SA Working Notes that are provided in Appendices A to C of this Addendum. In addition to those sites identified by the Council as not being suitable for inclusion in the Site Allocations DPD, the SA assessed some additional sites put forward via consultation responses. It recommended that these should not be taken forward, for similar reasons to those mentioned above (e.g. location in Green Belt).

The outcome of this process was that all the sites considered through the Schedules of Site Appraisals that were considered to be 'reasonable alternatives' went on to be included in the Site Allocations DPD (i.e. there were not any 'reasonable alternatives' that were not taken forward).

The only exceptions were those sites with a capacity of less than 10 dwellings which were not considered for specific identification in the Site Allocations DPD due to their small size. In other words, the Council did not exclude sites from the Site Allocations DPD that were considered to be appropriate in terms of both their sustainability and their compliance with strategic policies set out in the adopted Core Strategy.

At the Publication (Pre-Submission) Stage the 'preferred options' sites and associated policies underwent a more detailed assessment against each of the objectives in the Site Allocations SA Framework. For the Local Allocations that had already been assessed as part of the Core Strategy, the previous assessments were copied across and updated based on any new information that was available at this stage.

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<sup>3</sup> PAS Principles of Plan Making (2013), Chapter 6 – The Role of Sustainability Appraisal.

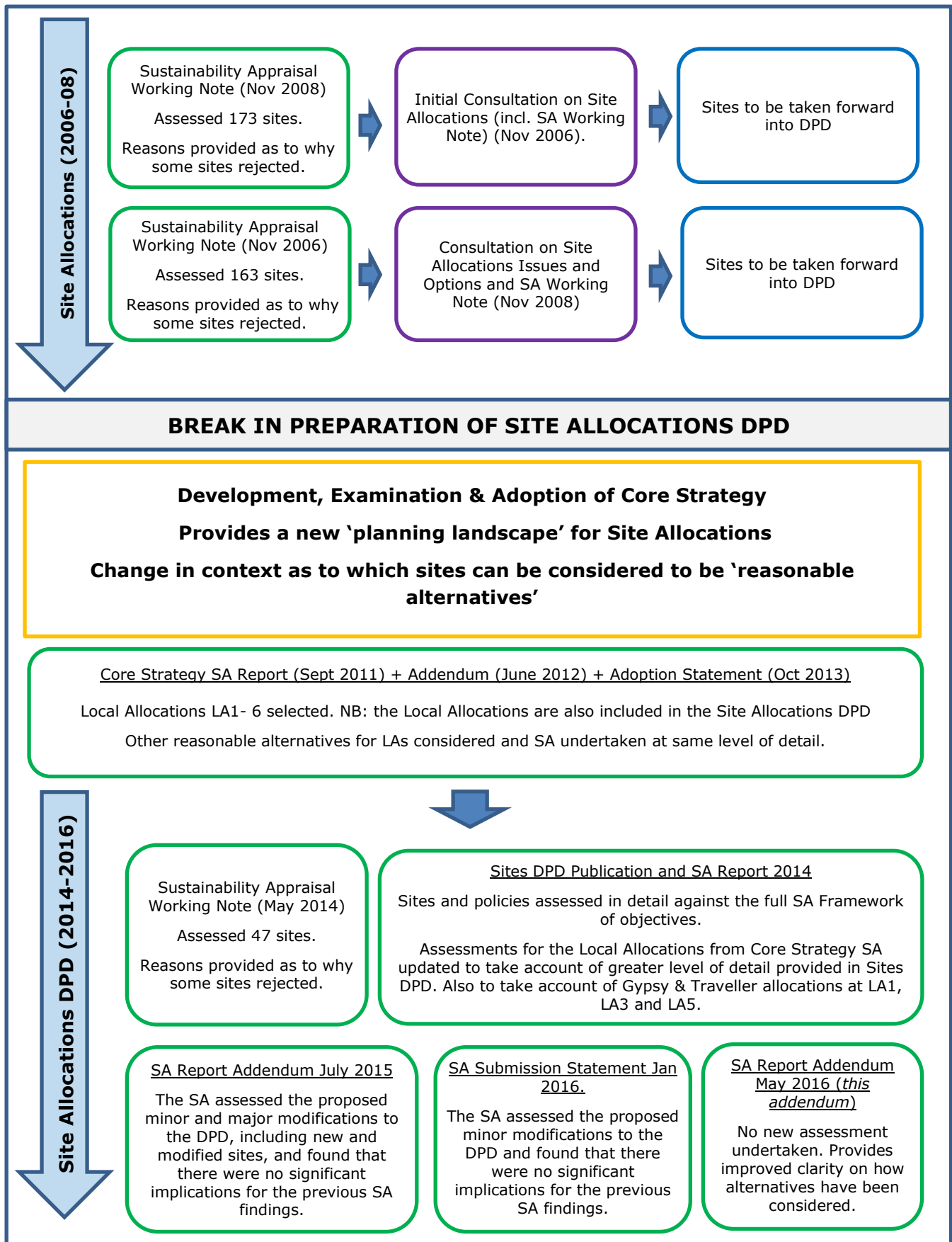


Of the sites assessed at the Publication stage, all, with one exception, are included in the Submitted Site Allocations DPD. That exception is Proposal H/6 (39-41 Marlowes, Hemel Hempstead) which was deleted as it was no longer available for housing: having been leased by its owners (Dacorum Borough Council) to the local mental health trust to accommodate a health centre displaced from a larger redevelopment site (now MU/1). At the Focused Changes Stage (see SA Report Addendum July 2015) (Examination Document SUB13) one additional allocation (Proposal L/4: Dunsley Farm, London Road, Tring) was included in the DPD and was subject to a full assessment.

All of the sites included in the Site Allocations DPD comply with the policies in the Core Strategy. Sites that did not comply with the policies (e.g. those in the Green Belt) were 'sieved out' through the analysis reported in the three Schedules of Site Appraisals. The details of why sites were not carried forward can be found in Appendices A to C of this Addendum. The majority of the reasons for rejecting sites were based on non-compliance with the Core Strategy – particularly with regard to Policies CS1: Distribution of Development; CS2: Selection of Development Sites; CS5: Green Belt; and CS24: The Chilterns Area of Outstanding Natural Beauty.

The reasons for rejecting sites at the various stages in the development of the Site Allocations DPD all remain valid, as there have not been any material changes in circumstances which could result in a previously rejected site now being suitable for inclusion in the DPD, either in terms of the national or local policy context.

Figure 1: Dacorum Site Allocations DPD – consideration of Site Alternatives



#### 2.3.4 *Consideration of alternatives for Gypsy and Traveller Sites*

In Pre-Examination correspondence the Inspector raised some queries relating specifically to the consideration of alternatives for Gypsy and Traveller site allocations. This section provides information on the planning and accompanying SA processes relating to the provision of Gypsy and Traveller sites in the Site Allocations DPD.

The 2008 Issues and Options consultation included detailed consideration of the recommendations of the 'Accommodation Needs of Gypsies and Travellers in South and West Hertfordshire, Stage Two: Identification of Potential Gypsy and Traveller Sites' prepared by consultants Scott Wilson (Examination Document HG15). This identified 24 sites within Dacorum for consideration. The consultation also included two additional sites suggested by members of the public.

All of these 26 sites were considered to be 'reasonable alternatives' at this time, although one (D26) did not perform as well as the others in terms of meeting the sustainability objectives of the SA, due to the site being located in the flood zone. Whilst it could have been discounted from further consideration for this reason, it was included in the consultation for completeness.

Through this 2008 consultation a number of other locations were suggested as alternative Gypsy and Traveller sites. However, for the reasons set out in Table 5 and paragraph 3.15 in the Cabinet Report of March 2009 (Examination Document SA8), none were considered to comprise reasonable alternatives. The reasons for this conclusion are repeated in section 4 of the Providing Homes and Community Facilities Background Issues Paper that accompanies the Site Allocations DPD (Examination Documents SA4). Reasons for not considering the sites further included sites:

- not being available or needed for existing or proposed uses;
- effectively duplicating options already identified in the Scott Wilson report;
- providing a poor environment for residents; and
- being poorly located in relation to services and facilities.

#### *Pre-Submission (Publication):*

In the time between the 2008 Issues and Options consultation and publication of the Pre-Submission Site Allocations DPD, the Core Strategy was progressed and adopted. The adoption of the Core Strategy is a critical moment in terms of the definition of reasonable alternatives for Gypsy and Traveller provision (and other types of land uses) in the context of the Site Allocations DPD. As described in Section 2.3 it created a clear and logical distinction between those sites considered to be reasonable alternatives *before* the adoption of the Core Strategy, and those *after*.

As described above, key Core Strategy policies that had an impact in terms of reducing the pool of reasonable alternatives for all development sites, including Gypsy and Traveller sites were CS2: Selection of Development Sites; CS5: Green Belt; and CS22: New Accommodation for Gypsies and Travellers. These policies were tested through examination and found 'sound.'

The Council's specific approach to the allocation of sites for Gypsies and Travellers was set out in its response to the Core Strategy Hearing Issues Paper 7: Affordable Housing and Gypsies and Travellers. Paragraph 7.3.4 of this statement reads as follows:

*"In terms of the location of sites, new pitches are expected to be provided alongside large-scale planned development, particularly the appropriate local allocations. These sites will be defined on the Proposals Map. This approach is intended to aid integration of sites with the settled community; reduce the marginalization of the travelling communities; and ensure occupants of the sites have good access to local services and facilities such as health and education. The Council will be clearer about the appropriate and fair target to use at this time. It may or may not be necessary to supplement this supply with other identified site(s) in the Site Allocations DPD."*

The policy context established by the Core Strategy sets the parameters for more detailed locational decisions within the Site Allocations DPD; governing the choice of sites within the various Schedules of Proposals and Sites in the Site Allocations DPD.

The application of these policies means that potential Gypsy and Traveller sites previously considered in 2006-08 were not in conformity with the Core Strategy – with the exception of those located within what are now the Core Strategy Local Allocations<sup>4</sup>. The majority of sites identified within the Scott Wilson Report (Examination Document HG15), plus the 2 additional site suggestions, were therefore discounted as no longer being reasonable alternatives.

Given this change in context, the only possible alternatives that remained for Gypsy and Traveller sites were therefore as constituent parts of the Local Allocations.

For the three smaller Local Allocations (LA2, LA4 and LA6) there were reasons as to why these sites could not be considered as reasonable alternatives and they were therefore discounted from further consideration. The reasons for discounting pitch provision on these sites, and therefore for them not being assessed in the Sustainability Report in terms of containing a potential Gypsy and Traveller element, are provided in the ‘Providing Homes and Community Facilities Background Issues Paper’ that accompanies the Site Allocations DPD (Examination Documents SA4). The reasons are summarised as follows:

LA2: Old Town, Hemel Hempstead

- Relatively small size of site makes integration with new and existing settled community more difficult.
- Topography (i.e. relatively steep slope)
- The need for the architecture of the new development to appropriately respect the historic character of the Old Town Conservation Area.

LA4: Hanburys and the Old Orchard, Berkhamsted

- Relatively small scale of site makes integration with new and existing settled community more difficult.
- Good access to A41, but actual site access onto Shootersway relatively constrained.

LA6: Chesham Road, Bovingdon

- Relatively small scale of site makes integration with new and existing settled community more difficult.
- Relatively ‘tight’ nature of the site due to constraint of balancing pond.

The remaining three Local Allocations (LA1, LA3 and LA5) were considered to be reasonable alternatives and they were therefore assessed through the SA Report that accompanied the Pre-Submission Site Allocation DPD in 2014 (Examination Document SUB20). This SA used the appraisal from the Core Strategy SA Report for these sites, but updated this to take account of the inclusion of the Gypsy and Traveller site (and any other changes made to the planning requirements). The SA treated the Gypsy and Traveller pitches in the same way as for other forms of residential development. When assessing sites as part of a wider mixed-use scheme, such as within a Local Allocation, they have been considered as part of this wider scheme, rather than assessed as a separate element.

## 2.4 Summary

During the development of the Site Allocations DPD alternative sites have been considered at a number of stages and subject to SA. At each stage some sites have been discounted from being considered as being ‘reasonable alternatives’, based on their location and other constraints. The

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<sup>4</sup> Site D20 is located within Local Allocation LA2, sites D22 and D23 within LA3 and site D11 within LA5.

adoption of the Core Strategy in 2013 provided a new planning context for the Borough that meant that some sites that had previously been considered as 'reasonable alternatives' could no longer be considered as such. However it did not result in the opposite effect, i.e. of making some sites that were previously rejected now being considered as reasonable.

From all of the sites that have been put forward and appraised since 2006, all those that are now considered as being 'reasonable alternatives' are included in the Site Allocations DPD that has been submitted for Examination. There are therefore no 'reasonable alternative' sites that have been excluded from the DPD. The reasons for rejecting sites at a particular stage all remain valid.

### 3 Next Steps

This Addendum forms part of the SA Report documents that will be subject to examination.

It may be necessary to undertake further additional SA to respond to any Site Allocations changes that are recommended by the Inspector, or put forward by the Council, during the Examination process. Any such additional SA will be documented in a further addendum to the SA Report.

When the Site Allocations is adopted it will be accompanied by an SA Adoption Statement. In line with the SEA Regulations, the SA Adoption Statement will provide the following information:

- How environmental/sustainability considerations have been integrated into the Site Allocations;
- How the SA Report has been taken into account;
- How opinions expressed in relation to the consultations on the Site Allocations and SA Report have been taken into account;
- The reasons for choosing the Site Allocations as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental/sustainability effects of the implementation of the Site Allocations.



## APPENDICES

### Introduction to Appendices

Appendices A to C provide extracts from the SA Working Notes published in December 2006, October 2008 and May 2014 respectively. The sections copied across into these appendices describe the processes and outcomes of the work undertaken by the Council in preparing the Schedules of Site Appraisal and the supporting work undertaken in the SA process. The text has been modified, but only to update the tense in which it is written in order to make it appropriate for this new May 2016 document. The content has not been changed.

### Appendix A: Extract from SA Working Note December 2006

Of the 181 sites proposed, the initial sustainability appraisal identified very few conflicts. Those that were identified are outlined in Table 1. As they conflict with key environmental designations defined by the Council, it was recommended that these sites were not taken forward to the Preferred Options stage. However, where a designation may conflict with a small area of a proposed site, the site may still be considered at the Preferred Options stage with the intention of avoiding conflict with or damage to the designation.

**Table 1: Initial Assessment of Site Appraisals – Identified Conflicts**

Site Reference	Site Name	Comments	Take forward to Preferred Options Stage?
H/t10	Water Gardens North Car Park	The area conflicts with Flood zone 2 – greenfield site	Yes – Is actually a brownfield site and not greenfield as stated in Schedule of Site Appraisals document.
Be/h8	Land at Bank Mill Lane	The greenfield site is within close proximity to the AONB and conflicts with flood zones 2 and 3	No
M/h4	Dammersley Close	Loss of Green Belt, remote from local facilities and services, close proximity to the AONB and entirely within flood zone 2 and 3 on a greenfield site.	No
M/t1 (a)/(b)	Land at Slip End/Pepsal End	Loss of Green Belt and Ancient Woodland	No

In addition to the sites identified in Table 1 in this initial assessment of sites, DBC identified 20 sites that were recommended not to be progressed to the Preferred Options stage. These are listed in Table 2. The assessment agreed with these recommendations.

**Table 2: Sites recommended by DBC not to be progressed to the Preferred Options Stage**

Site Reference	Site Name	Comments
Be/h4	Pea Lane, Northchurch	Area conflicts with AONB
B5/h5	Land at Shooters Way	Area conflicts with AONB
Be/c1	Hospice Site, Shooters Way	Area conflicts with AONB
T/h11	Station Road/Cow Lane	Area conflicts with AONB*
T/h12	South of Park Street	Area conflicts with AONB*
T/L4	Land east of Cow Lane	Area conflicts with AONB*
T/t1	Land adjacent to Tring Station car park, Station Road	Area conflicts with AONB*
Bov/h3	Little Gables Long Lane	Loss of Green Belt – Site insufficient capacity to merit allocation
Bov/h5	Land at Shantock Hall Lane	Loss of Green Belt and severely burden on local services – lack of exceptional circumstances to warrant new building
Bov/h6	Land at Grange Farm	Loss of Green Belt and severely burden on local services – lack of exceptional circumstances to warrant new building
Bov/L1	Drive-thru cinema, Bovington Airfield	Loss of Green Belt and impact on traffic – inappropriate development in the Green Belt
KL/h4	Rucklers Wood, Rucklers Lane	Semi-natural ancient woodland
M/h1	Land at Cheverells Green (east)	Area conflicts with AONB*
M/h6	Land at Buckwood Road	Area conflicts with AONB*
M/h7	Land at Buckwood Road/Cavendish Road	Area conflicts with AONB*
O/h2	The Twist, Wiggington	The site conflicts with AONB and an Area of Archaeological Significance
O/h8	End of Nunfield Chipperfield	Loss of open countryside
O/h9	Ackwell Simmons Ltd, Chapel Croft	Loss of Green Belt and pressure on existing facilities
O/L1	Piccotts End Pumping Station	Greenfield site conflicts with flood zones 2 and 3
O/t1	Water End A4146	Greenfield site conflicts with flood zones 2 and 3 and AONB*

\* Take to the Preferred Options stage if an exceptional overriding need is identified; consider the need for the proposed use.

All Urban Capacity Sites (as identified in the Urban Capacity Study, January 2005) propose to utilise brownfield sites for residential development or intensification, and do not present any conflicts with the key environmental designations. Therefore, DBC suggested that they should be taken forward to the Preferred Options stage. The sustainability appraisal agreed with this approach.



## Appendix B: Extract from SA Working Note October 2008

Of the 173 sites proposed, the initial sustainability appraisal identified a number of conflicts relating to key environmental designations. While some of these had been identified in the Schedule of Site Appraisals, others had not.

In the cases where sites that had been recommended by DBC to be taken forward to the next stage, but the assessment identified conflicts with key designations, recommendations were made as to whether these sites should or should not be taken forward to the next stage. Where a designation conflicts with only a small area of a proposed site, the site may still be considered at the next stage with the intention of avoiding conflict with, or damage to, the designation.

These sites and recommendations are outlined in Table 3.

**Table 3: Initial Assessment of Site Appraisals – Identified Conflicts**

Site Reference	Site Name	Comments	Take forward to next Stage?
H/h48a	Land at Gadebridge North (Boxted Farm)	Loss of greenfield site in Green Belt Topography of site could affect pedestrian / cycle accessibility Part of site in ancient woodland	Yes. However new development should avoid the area of Ancient Woodland.
H/h92	Boxmoor House School, Box Lane	Distance from a range of other local services and facilities Site contains a Scheduled Ancient Monument	Yes. However the presence of the SAM should act as a constraint to how the site is developed.
T/h15	Land north of Icknield Way/ south of Grand Union Canal	Greenfield site within the Green Belt Part of site in AONB	Yes. However development should not extend into the AONB. Consider modification of site boundary before taking to next stage.
ALD16	Land at Tom's Hill	Part of site in AW, AONB, SAC and SSSI	This site already has planning permission. Adverse effects on the key designations needs to be avoided.
ASH4	Garage at Hudnall Corner	Site in Rural Area and next to an area of Archaeological significance Site in AONB	This site already has planning permission. This redevelopment of a brownfield site is likely to have less impact than if it were on a greenfield site.
STA2	Crown Estate Land east of Hemel Hempstead	Loss of greenfield site in Green belt Site envelops AW	Yes. However new development should avoid the area of Ancient Woodland.
WA55	Bradden Meadow, Jockey End, Gaddesdan Row	Greenfield site in rural area Site is in AONB	This site already has planning permission. This redevelopment of a brownfield site is likely to have less impact than if it were on a greenfield site.
Be/o5	Edgeworth House, High Street	Approx. 15% of site in flood zone 2 and 3	Yes. However development should avoid area within flood zones or impacting on the flood zones.
H/h89	Land adj. Red Lion PH, Nash Mills Lane	Loss of greenfield site in Green Belt Approx. 20% of site in flood zones 2 and 3	Yes. However development should avoid area within flood zones or impacting on the flood zones.
H/L7	Sappi (Site B), Belswain Lane	Approx. 50% in flood zones 2 and 3	Yes. However development should avoid area within flood zones or impacting on the flood zones.
O/h17	Land at Marston Place, Chapel Lane, Long Marston	Area has limited infrastructure to support new housing development Almost the entire site is in flood zones 2 and 3	No. Unless use is changed to one compatible with development in a flood zone.

Site Reference	Site Name	Comments	Take forward to next Stage?
KL48	Open land surrounding Red Lion PH, Nash Mills Lane	Site located within the Green Belt Approx. 10% of site in flood zone 2	Yes. However development should avoid area within flood zone or impacting on the flood zones.
TW25	Marston Court, Long Marston	Site within the Tring Reservoirs Landscape Character Area, within a wildlife site and an area of archaeological significance. Adjacent to an area of open space, conservation area and a public right of way passes through site Approx. 5% of site in flood zone 2 and 3	Yes. However development should avoid area within flood zones or impacting on the flood zones.
WA51	London Road, Markyate	Greenfield site within the Green Belt Approx. 5% of site in flood zone 2 and 3	Yes. However development should avoid area within flood zones or impacting on the flood zones.
D26	Land adj to Bourne End Mills	Site lies in flood zone 2 and 3	No.

In addition to the sites identified in Table 3, the Schedule of Site Appraisals recommended that several sites should not to be progressed to the next stage. These sites are listed in Table 4. The assessment agreed with these recommendations where they pertained to the key environmental designations. However, the assessment had not considered if there existed any additional reasons why these sites should not proceed.

**Table 4: Sites recommended by DBC not to be progressed to next stage**

Site Reference	Site Name	Comments
Be/c3	Water Lane/High Street	A police enquiry office would not be appropriate at this location. Close to AONB
Be/h11	Land north east of Admiral Way/Tortoiseshell Way	Loss of valuable local amenity green and town has overall deficiency of open space
Be/h15	Land at Darfield, Shootersway/ Darrs Lane	Greenfield site in Green Belt Impact on character of AONB Poorly located in terms of access to public transport and to local facilities and services
Be/h17	Land rear of Shootersway	Greenfield site in Green Belt Impact on character of AONB Poorly located in terms of access to public transport and to local facilities and services Entire site in AONB
Be/o1	St Mary's Church grounds	Part of site in floodzone 2 and 3
Be/o2	Bridle Way	Site is too small to warrant designation as open space
Be/o3	Victoria Junior School	Site is too small to warrant designation as open space
Be/o4	St Peter's Church grounds	Site is too small to warrant designation as open space
Be/o6	Swing Gate Junior School	Site is too small to warrant designation as open space
Bov/h10	Land at Bovingdon Airfield	Predominantly greenfield site within the Green Belt Village had reached capacity and already suffers from severe traffic congestion

Site Reference	Site Name	Comments
Bov/h5a	Land off Shantock Lane	Greenfield site within the Green Belt Site would represent an isolated and unsustainable location for housing
Bov/o1	Old Dean	Site is too small to warrant designation as open space
Bov/o2	Lancaster Drive	Site is too small to warrant designation as open space
H/h76, Hr5, H/tcb1	Former Texaco petrol filling station	Flood risk would need to be carefully assessed Part of site in floodzones 2 and 3
H/h77	Land south of Link Road, Gadebridge	Loss of greenfield site in Green Belt Part of site in floodzones 2 and 3
H/h83	Two Waters East	Loss of greenfield site Land falls within the flood zone
H/h91	Land adj. Highfield House, Jupiter Drive	Trees are also protected by a Tree Preservation Order
H/o11	Woodland belt off Tewin Road	Site is too small to warrant designation as open space
H/o13	Datchet Close	Site is too small to warrant designation as open space
H/o14	Adjoining Howe Grove	Site is too small to warrant designation as open space
H/o2	Woodland between Hawthorn Lane and Martindale Rd	Site is too small to warrant designation as open space
H/o3	Warners End Wood	Site is too small to warrant designation as open space
H/o4	Trouvere Park	Site is too small to warrant designation as open space
H/o5	Brickmakers Lane Allotments	Site is too small to warrant designation as open space
H/o6	Dell at The Crofts	Site is too small to warrant designation as open space
H/o7	Longdeans School and Woodfield School	Site is too small to warrant designation as open space
H/o9	Martindale School	Site is too small to warrant designation as open space
KL/c2	Rectory Farm, Rectory Lane	Site lies in Green Belt Part of site in floodzones 2 and 3
KL/h10	Land East of Watford Road	Greenfield site in Green Belt Site lies within a Schedule Ancient Monument Part of site in floodzones 2 and 3
KL/h11	Land adjacent to 119 Hempstead Road	Loss of the Green Belt At a distance from local facilities and services
KL/h12	Land at Rucklers Lane	Greenfield site in Green Belt Poorly located in terms of access to public transport and to local facilities and services
KL/h6	Garages rear of Waterside	Potential loss of garaging serving local properties
KL/h7	Scout Hall, Rear of Great Park	Site will lead to the loss of a community use
KL/h8	Land North-East of A41 Bypass	Greenfield site within the Green Belt Remote from local facilities and services
KL/h9	Land South-West of A41 Bypass	Greenfield site within the Green Belt Remote from local facilities and services Part of site adjacent to ancient woodlands
O/h11	Land at The Orchard, Little Heath Farm, Potten End	Greenfield site located in the Green Belt Poorly served by public transport
O/h16	Land at Astrope Lane, Long Marston	Area has limited infrastructure to support new housing development Entire site in floodzone 2 and part in floodzone 3

Site Reference	Site Name	Comments
O/h21	Land west of Woodcroft Farm, Water End Road, Potten End	Loss of the Green Belt Isolated and unsustainable site, remote from services and facilities
O/h22	Land off Potten End Hill, Potten End	Loss of the Green Belt Isolated and unsustainable site, remote from services and facilities
O/h23	Land south of the A41 Bypass, Wigginton	Isolated and unsustainable site Impact on AONB Loss of the Green Belt
O/h24	Land north of Wigginton	Loss of the Green Belt Entire site is in AONB
O/h25	Land at James Farm, Wilston	Isolated greenfield site in Rural Area Immediately adjacent to the AONB
O/h26	Land north of Lower Icknield Way, Wilstone	Isolated greenfield site in Rural Area Unsustainable location at some distance from a wide range of facilities and services Entire site is in AONB
O/h27	Land south of Lower Icknield Way, Wilstone	Isolated greenfield site in Rural Area Unsustainable location at some distance from a wide range of facilities and services Entire site is in AONB
O/h28	Land south of Tringford Farm, Wilstone	Isolated location at some distance from a wide range of facilities and services Greenfield site in Rural Area Adjacent to a Site of Special Scientific Interest and Nature Reserve Entire site is in AONB Site is in flood zones 2 and 3
O/h29	Land at The Green, Little Gaddesden	Greenfield site in Rural Area and AONB Poorly located Entire site in AONB
O/h30	Land adj. to The Willows, Potten End Hill, Water End	This is an isolated and unsustainable site Loss of the Green Belt
O/smlvb1	Garden Scene Nursery, Chipperfield	Some distance from a major urban centre Local bus services are relatively infrequent Lack of local employment opportunities.
T/h16	Land north of A41 (adj. London Lodge)	Greenfield site within the Green Belt Entire site is in AONB
T/h17	Land south of A41 (West Leith Woodlands)	Greenfield site in Green Belt and AONB Poorly located in terms of access to public transport and to local facilities Part of site is in ancient woodland Part of site is in SSSI
T/o1	Frances de la Salle School	Site is too small to warrant designation as open space

## Appendix C: Extract from SA Working Note May 2014

Of the 67 sites included in the Schedule of Site Appraisals (May 2014), 26 were proposed for inclusion in the Site Allocations DPD, with the remaining 41 not proposed for inclusion (NB: of these four sites already have planning permission for development and are not to be included in the DPD for that reason).

In the cases where sites that were recommended by DBC to be taken forward to the next stage, but the assessment identified conflicts with key designations, recommendations were made for progressing with the development.

These sites and recommendations are outlined in Table 5.

**Table 5: Sites proposed by DBC to progress to the Site Allocations DPD**

Site Reference	Site Name	Comments	SA - Agree with decision?
<b>Hemel Hempstead</b>			
H/h34a	National Grid site, London Road	Site is close to " <i>Harrison's Moor, Boxmoor Common</i> " wildlife site.	Yes. No major constraints identified.
H/h34b	339-353 London Road	Site is close to " <i>Harrison's Moor, Boxmoor Common</i> " wildlife site.	Yes. No major constraints identified.
H/h101	Land r/o 186-202 Belswains Lane	Partly in FZ2 and 3a	Yes. However development should avoid area within flood zone or impacting on the flood zones.
H/h102	Apsley Paper Trail land, London Road	Partly in FZ2, 3a and 3b.	Yes. However development should avoid area within flood zone or impacting on the flood zones.
H/h103	Paradise / Wood Lane	No designations affected	Yes. No major constraints identified.
H/h104	Hemel Hempstead Station Gateway, London Road	Part of site in ' <i>Roman villa &amp; cemetery, Boxmoor; Roman building adj to station</i> ' Area of Archaeological Significance	Yes. No major constraints identified.
H/h105	39-41 Marlowes	Close to Listed Buildings. Adjacent to FZ2.	Yes. No major constraints identified.
H/h108	Civic Zone c/o Marlowes/Combe Street (North)/Leighton Buzzard Road	Partly in FZ2, 3a and 3b. Close to Listed Buildings.	Yes. However development should avoid area within flood zone or impacting on the flood zones.
H/h109	West Herts College, Marlowes	Partly in FZ2, 3a and 3b. Adjacent to Conservation Area. Close to Listed Buildings.	Yes. However development should avoid area within flood zone or impacting on the flood zones.
H/h110	233 London Road	No designations affected	Yes. No major constraints identified.
H/h80	Leverstock Green Lawn Tennis Club, Grasmere Close	No designations affected	Yes. No major constraints identified.
H/h112	Former Hewden Hire site, Two Waters Road	Partly in FZ2, 3a and 3b. Adjacent to Boxmoor Common Wildlife Site.	Yes. However development should avoid area within flood zone or impacting on the flood zones.
H/h113	Land to the r/o St Margaret's Way / Datchworth Turn	No designations affected	Yes. No major constraints identified.
H/h115	Ebbens Road	Adjacent to the ' <i>Grand Union Canal, Two Waters to Nash Mills Lane</i> ' Wildlife Site	Yes. No major constraints identified.
H/c5 and H/L8	Bunkers Park, Bunkers Lane / Bedmond Road	In Green Belt.	Yes. No major constraints identified.

Site Reference	Site Name	Comments	SA - Agree with decision?
H/L9	Market Square and Bus Station, Marlowes / Waterhouse Street	Adjacent to FZ2 and 3a. Close to Water Gardens P&G.	Yes. No major constraints identified.
<b>Berkhamsted</b>			
Be/H23	Former Police Station, High Street/Kings Road	Close to Listed Buildings. In " <i>Berkhamsted, medieval castle &amp; town, prehistoric &amp; Roman occupation</i> " Area of Archaeological Significance.	Yes. No major constraints identified.
Be/H24	Land at Gossoms End	Part of site is in FZ2, FZ3a & 3b. In " <i>Berkhamsted, medieval castle &amp; town, prehistoric &amp; Roman occupation</i> " Area of Archaeological Significance.	Yes. However development should avoid area within flood zone or impacting on the flood zones.
Be/h25	Berkhamsted Civic Centre and land to r/o High Street	In Conservation Area. Adjacent to Listed Building. In " <i>Berkhamsted, medieval castle &amp; town, prehistoric &amp; Roman occupation</i> " Area of Archaeological Significance.	Yes. No major constraints identified.
Be/h26	High Street/Swing Gate Lane	In Conservation Area. Close to Listed Buildings. In " <i>Berkhamsted, medieval castle &amp; town, prehistoric &amp; Roman occupation</i> " Area of Archaeological Significance.	Yes. No major constraints identified.
Be/L4	Land c/o Durrants Lane and Shootersway	Within the ' <i>Woodcock Hill, Berkhamsted</i> ' Historic Park & Garden. In the Green Belt.	Yes. Proposed use for formal and informal playing fields should not compromise this designation.
<b>Tring</b>			
T/h19	Depot land, Langdon Street	In Conservation Area. Close to AONB. Within 1km of SAC. Part of site in " <i>Medieval village of Tring</i> " Area of Archaeological Significance.	Yes. No major constraints identified.
<b>Kings Langley</b>			
KL/h16	Land adjacent to Coniston Road	-	Yes. No major constraints identified.
<b>Markyate</b>			
M/h10	c/o Hicks Road and High Street	Part of site in FZ2 & FZ3a. Majority of site in Conservation Area. Site adjacent to Listed Buildings. Close to AONB.	Yes. However development should avoid area within flood zone or impacting on the flood zones.
<b>Other settlements</b>			
O/h31	Garden Scene Nursery, Chapel Croft, Chipperfield	In Green Belt. Part of site in Conservation Area.	Yes. No major constraints identified.
O/c1	Amaravati Buddhist Monastery, Great Gaddesden	In AONB. Close to " <i>St Margaret's Copse</i> " wildlife site. Close to Listed Buildings.	Yes. However proposed replacement of buildings should not impact on the AONB.

In addition to the sites identified in Table 5, the Schedule of Site Appraisals recommended that several sites should not to be progressed to the next stage. These sites are listed in Table 6.

This assessment agreed with these recommendations where they pertained to the key environmental designations, however, this assessment had not considered in detail if there were any additional reasons why these sites should not proceed.

Table 6: Sites that DBC proposed should not progress into the Site Allocations DPD

Site Reference	Site Name	SA Comments	SA - Agree with Decision?
<b>Hemel Hempstead</b>			
H/h94	Land at Ridgeway Close	In Green Belt (on edge). Trees covered by TPOs on the site.	Yes
H/h95	Land adj A41	In Green Belt (on edge). Close to "Roughdown Common" SSSI and wildlife site.	Yes
H/h96	Land adj. Old Fishery Lane (Gadespring Cressbeds)	FZ3a & 3b. In Green Belt.	Yes
H/h97	Camelot Clubhouse and car park, Old Fishery Lane	In Green Belt (on edge). Site is in "Harrison's Moor, Boxmoor Common" wildlife site.	Yes
H/h98	Royal Mail Site, Hemel Mail Centre and D.O, Park Lane	Site already has planning permission granted. No designations affected.	Yes
H/h99	22 & 22a Two Waters Road (housing proposal)	FZ2, 3a & 3b. Site partly in the "Two Waters Apsley, Durrant Hill Cress Beds" wildlife site.	Yes
H/o15	22 & 22a Two Waters Road (removal of Open Land designation)	FZ2, 3a & 3b. Site partly in the "Two Waters Apsley, Durrant Hill Cress Beds" wildlife site.	Yes
H/h100	Lock Cottage, off Station Road (west of Two Waters Road)	FZ2. Site is in "Harrison's Moor, Boxmoor Common" wildlife site.	Yes
H/o16	Woodhall, Woodhall Lane (removal of Open Land designation)	No designations affected.	Yes
H/h106	Market Square (North) c/o Marlowes/Combe Street/Waterhouse Street	Adjacent to FZ2 and 3a. Close to "Water Gardens" Historic Park & Garden and to Listed Buildings.	Yes
H/h107	Market Square (South) c/o Marlowes/Bridge Street (South)/Waterhouse Street	Partly in FZ2 and 3a. Close to "Water Gardens" Historic Park & Garden.	Yes
H/h111	Henry Wells Square, Grovehill	No designations affected.	Yes
<b>Berkhamsted</b>			
Be/h1	Land at Ivy House Lane	Adj. to AONB. In Green Belt. Close to "Berkhamsted Common" wildlife site.	Yes
Be/h2f	Land south of Ashlyn's School	In Green Belt. Close to Listed Buildings.	Yes
Be/h6	Land adj. to Blegberry Gardens	In Green Belt. Adjacent to "Meadow S.W. of Shootersway Road" wildlife site. In "Middle to Late Iron Age occupation activity S of Shooters Way" Area of Archaeological Significance.	Yes
Be/h18	Fields adj. to New Road	In AONB. In Green Belt (on edge for part). Adjacent to Conservation Area. Across road from "Berkhamsted Castle" SAM and wildlife site. Adjacent to "Berkhamsted, medieval castle & town, prehistoric & Roman occupation" Area of Archaeological Significance.	Yes
Be/h19	Land to the West of Berkhamsted (i)	In AONB. In Green Belt. Adjacent to "Middle to Late Iron Age occupation activity S of Shooters Way" Area of Archaeological Significance.	Yes
Be/h19	Land to the West of Berkhamsted (ii)	Very close to AONB. In Green Belt (on edge for part). Site contains part of the "Meadow S.W. of Shootersway Road" wildlife site. Partly in "Middle to Late Iron Age occupation activity S of Shooters Way" Area of Archaeological Significance.	Yes

Site Reference	Site Name	SA Comments	SA - Agree with Decision?
Be/h20	Land at Castle Gateway, Castle Hill, Berkhamsted	In Green Belt. Close to AONB and Listed Buildings. In " <i>Berkhamsted, medieval castle &amp; town, prehistoric &amp; Roman occupation</i> " Area of Archaeological Significance.	Yes
Be/h21	Rose Cottage, Bank Mill Lane	Very close to AONB. Adjacent to FZ2.	Yes
Be/h22	Berkhamsted D.O, Office & Storage, 300 High Street	Planning permission already granted for retail development. Adjacent to FZ2 & 3a. In Conservation Area. Adjacent to Listed Building. In " <i>Berkhamsted, medieval castle &amp; town, prehistoric &amp; Roman occupation</i> " Area of Archaeological Significance.	Yes
<b>Tring</b>			
T/h18	Land south of Park Road	In AONB. Within 500m of " <i>Chiltern Beechwoods</i> " SAC. In the Green Belt. Part of site in Conservation Area. Close to a Listed Building.	Yes
<b>Bovingdon</b>			
Bov/h6a	Land at Grange Farm	In Green Belt. Close to Listed Building.	Yes
Bov/h8a	Duckhall Farm	In Green Belt. Close to Listed Buildings.	Yes
Bov/h9	Land south east of Homefield	In Green Belt.	Yes
Bov/h11	Land off Hempstead Road/Stoney Lane	In Green Belt. Loss of woodland.	Yes
<b>Kings Langley</b>			
KL/h13	Land fronting Love Lane	In Green Belt. Close to Conservation Area and " <i>Kings Langley Common</i> " wildlife site.	Yes
KL/h14	West Meon, 46 Langley Hill	In Green Belt.	Yes
KL/h15	Kings Langley Delivery Office, 32 High Street	Site already has planning permission for residential care home. In Conservation Area. Within the " <i>Medieval settlement of King's Langley</i> " Area of Archaeological Significance.	Yes
<b>Other settlements</b>			
O/h32	Land adj. Dunston, Chapel Croft, Chipperfield	In Green Belt. In Conservation Area. Close to Listed Buildings.	Yes
O/h33	Water End Lane, Potten End	Close to AONB. In Green Belt.	Yes
O/h34	West of jnt with The Bit and Chesham Road, Wigginton (i)	In AONB. In Green Belt. Right of Way crosses site. Close to Listed Buildings. Small part within " <i>Medieval village of Wigginton</i> " Area of Archaeological Significance.	Yes
O/h35	West of jnt with The Bit and Chesham Road, Wigginton (ii)	In AONB. In Green Belt.	Yes
O/h36	West of jnt with The Bit and Chesham Road, Wigginton (iii)	In AONB. In Green Belt.	Yes
O/h37	Land adj. A41, Bourne End (Amen Corner)	Site forms part of the " <i>Harrison's Moor, Boxmoor Common</i> " wildlife site. In the Green Belt. Adjacent to FZ2.	Yes
O/h38	Land south of Bourne End/adj. A41 (Bourne End Field)	In Green Belt. Close to Listed Buildings.	Yes
O/h39	Sharlowes Farm, Flaunden Hill, Flaunden	In Green Belt. In Conservation Area. Directly adjacent to Listed Buildings associated with Sharlowes Farm.	Yes
O/h40	Land north of Dixons Gap, Dixon's Wharf, Wilstone	Adjacent to FZ2. Site has extensive vegetation cover.	Yes



Site Reference	Site Name	SA Comments	SA - Agree with Decision?
O/h41	Former Egg Packing Facility at Luke's Lane, Gubblecote	Site already has planning permission for housing and business units Approx. half the site in FZ2, FZ3a & 3b	Yes
O/h1	Bourne End Mills Industrial Estate, Bourne End	Approx. half the site in FZ2. In Green Belt.	Yes
O/L2	Land at A4251 London Road, Cow Roast	In AONB. Within 1 km of SAC. Small overlap with SAM ( <i>Roman Settlement at the Cow Roast Inn</i> ). Within " <i>Late Iron Age &amp; Roman settlement at Cow Roast</i> " Area of Archaeological Significance. In Green Belt.	Yes