



Site Allocations Main Modifications Report of Representations

Part 2

Contains:

- **Annex B: Results**
 - **List of Respondents**
 - **Number of Representations**
 - **Main Issues Raised and Council's Response**
 - **Schedule of Proposed Changes**
 - **Responses not considered in the Report of Representations**

April 2017

This publication is **Part 2** of the Report of Representations for the Main Modifications to the Site Allocations DPD. It contains the results of the consultation on the Main Modifications published following the Site Allocations hearings.

Part 1 of the Report of Representations contains the Main Report and Annex A, which contains a summary of the consultation process and discusses the main issues raised.

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

Note: Includes both supporting and objecting comments.

Person ID	Consultee Name	Organisation Details	Agent ID	Agent Name	Agent Organisation Details
56252	Ms Debbie Mack	Historic England			
627495	Mr Nigel Agg	Taylor Wimpey UK Ltd	210999	Mr Martin Friend	Vincent & Goring
224725	Mr Neil Clemmens				
332446	Mrs J Young				
333255	Mrs Jennifer Habib	Chiltern Society and London Green Belt Council			
489736	Mrs Jenny McEntee				
498429	Steve Baker	CPRE - The Hertfordshire Society			
610552	Miss Julie Stefan				
610554	Mr Steve Doughty				
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)			
743858	Mr Paul Phipps	Whiteacre Ltd			
769545	Mr Jonathan Owen				
769561	Ms Debbie Willson				
770860	Mrs Heather Ebdon				
771821	Mr Stephen Tyne				
772008	Mr John Fielden				
772240	Mrs Sue Davis				
772477	Mr Roy Warren	Sport England			
774118	Ms Diane Clarke	Network Rail			
775876	Mr Henry Wallis				
775883	Mrs Carolyn Wallis				
776167	Mrs Christine Ridley				
776188	Ms Hilary Passi				
776939	Mr Siva Niranjana				
777070	Mr Lee Royal		777069	West Hemel Action Group WHAG	
777106	Mr Tony Carroll				
777117	Miss Helen Matthews				
777510	Mr Keith Snoxall				
777591	Mrs Sandy Walpole				
861395	Mr Ian Burrus				
863812	Mrs Marion Adams				
864555	Mrs Rachel Hilson				
864862	Mrs Frances Bugg				
864901	Mr Leo Bedford				
865138	Mrs Anne Lyne				
865181	Mr Kai Mitchell	Environment Agency			
865192	Tyne				

Person ID	Consultee Name	Organisation Details	Agent ID	Agent Name	Agent Organisation Details
928457	Mrs Donna Lee				
929629	Ms Lucy Murfett	The Chilterns Conservation Board			
1046219	S Wilson				
1046223	R Williams				
1054874	Mr Ian Laidlaw-Dickson				
1057967	Mr Cornelius Nicoll				
1057987	Mr Jon Owen				
1058532	Mrs Louise Thurston				
1059053	Mr Kelvin Clayson				
1059196	Mr Adam Briffett				
1059210	Mrs Myra De Vries				
1059333	Mr Steve Day				
1059369	Wood				
1059374	Mrs Sheila Neary				
1059400	Mrs Emma Amos				
1059437	Mrs Mary Baker-Simpson				
1059448	Mrs Karen Morris				
1059452	Mrs Angela Whitehead				
1059458	Mr Paul Evans				
1059459	Dr Tressa Amirthanayagam				
1059460	Mr Adrian Howard				
1059468	Mr John Mawer				
1059469	Mr Ian Norton				
1059473	Ms Rose Walker				
1059510	Mr Michael Ridley				
1059618	Ms Lisa Charles				
1059629	Mrs Tracy Barnes				
1059698	Mr Richard Lyne				
1059761	Mr John Holm				
1059763	Mrs Deborah Kinloch				
1059773	Mrs Anna Barnard				
1059774	Mrs Alison Evans				
1059776	Mr Adrian England		1059775	Mr Adrian England	
1059780	Mr Martin Evans				
1059783	Mr Ryan Emmett				
1059785	Mr Steven Cable				
1059787	Mr Michael Fejdman				
1059788	Mr Peter Mabley				
1059789	Mrs Alison Somek				
1059790	Mr Johan De Vries				
1059795	Mr David Green				
1059800	Miss Sophie Horwood				

Person ID	Consultee Name	Organisation Details	Agent ID	Agent Name	Agent Organisation Details
1059807	Pattinson				
1059823	Mrs Kate Bedford				
1059827	Ms Angela Flahive				
1059829	Mr David Reed				
1059831	Mr Paul Berry				
1059832	Mr Peter Brown	BRAG			
1059833	Mr Russell Davis				
1059837	Mr Gordon Rolfe	Bourne End Village Association	1059835	Mr. Michael Pritchard	Bourne End Village Association
1060551	Mr Brian Bustin				
1060575	Mr Steve Jay				
1060582	Angela Flahive				
1060754	Mr John Chambers				
1060781	Mrs M.A Nodes	Drayton Beauchamp Parish Council			
1060852	Fairfax Acquisitions Limited	Fairfax Classical Properties Ltd	1060854	Mr Tim Rodway	
1060867	Tessa Simpson	London Luton Airport			
1060956	Mrs Jenny Welch				
1060964	Judith Chandler				
1060970	Mrs Julie Wrathall				
1061009	Mr Ian Johnson				
1061018	Mr Gary Ellis				
1061022	Emily Ellis				
1061026	Mr David Reed				
1061033	Mr John Ebdon				
1061086	Jean Rolfe				
1061100	Velda Wong				
1061114	Mrs Dawn Monsees				
1061121	Mrs Gladys Greenwood				
1061130	Laura Higgins				
1061134	Marina Smith				
1061140	Mr Mark Frey				
1061145	Nikki Sargento				
1061153	Sarah Mangan				
494131	Mr Michael Emett	CALA Homes	1061196	Robyn Nicholl	Barton Willmore
1061295	Mr Michael Pritchard	Bourne End Village Association			
1061305	Mr Justin Julius				
1061326	Caroline Kirton				
1061401	Mr Shane Kirton				
1061418	Mr Paul Bicknell				
500752	National Grid Property & Gas		1061515	Lucy Bird	St William Homes LLP
1061550	Mrs Ruth Marsh				
1061553	Tammy Clark				
1061557	Mr Tom Murray				

Table 2 – Number of Representations Considered

(a) Main Modifications

Main Modifications								
Main Modification no.	Number of Representations							
	Total received	Total in support	Total objecting	Objections				
				<i>saying the Main Modifications to the Site Allocations DPD are</i>				
				<i>not legally compliant</i>	<i>not justified</i>	<i>not effective</i>	<i>inconsistent with national policy</i>	<i>not positively prepared</i>
MM1	8	0	8	2	3	4	0	1
MM2	12	1	11	8	2	1	0	0
MM3	2	0	2	2	0	0	0	0
MM4	1	1	0	0	0	0	0	0
MM5	0	0	0	0	0	0	0	0
MM6	15	2	13	3	9	12	3	8
MM7	37	1	36	7	19	28	5	17
MM8	2	1	1	1	0	0	0	0
MM9	47	2	45	8	24	32	3	20
MM10	14	1	13	3	8	10	2	8
MM11	0	0	0	0	0	0	0	0
MM12	1	0	1	1	1	1	0	0
MM13	2	0	2	2	0	0	0	0
MM14	0	0	0	0	0	0	0	0
MM15	2	1	1	0	1	1	0	1
MM16	0	0	0	0	0	0	0	0
MM17	1	0	1	0	0	0	0	0
MM18	11	6	5	2	0	0	0	0
MM19	38	1	37	10	23	26	8	19
MM20	52	1	51	14	25	35	2	19
MM21	53	1	51	21	23	29	6	19
MM22	6	2	4	2	1	1	0	0
MM23	13	5	7	3	3	4	0	3
MM24	2	1	1	0	1	1	0	0
MM25	1	1	0	0	0	1	0	0
MM26	0	0	0	0	0	0	0	0
MM27	2	0	2	1	0	0	0	0
MM28	3	3	0	2	0	0	0	0
MM29	1	1	0	0	0	0	0	0
MM30	3	2	1	2	0	0	0	0

Main Modifications								
	Number of Representations							
	Total received	Total in support	Total objecting	Objections				
				<i>saying the Main Modifications to the Site Allocations DPD are</i>				
				<i>not legally compliant</i>	<i>not justified</i>	<i>not effective</i>	<i>inconsistent with national policy</i>	<i>not positively prepared</i>
Main Modification no.								
MM31	2	2	0	1	0	0	0	0
MM32	2	1	1	1	0	0	0	0
MM33	4	3	1	2	0	0	0	0
MM34	2	1	1	1	0	0	0	0
MM35	1	1	0	1	0	0	0	0
MM36	0	0	0	0	0	0	0	0
MM37	1	0	1	1	0	0	0	0
MM38	48	2	46	19	22	27	8	18
MM39	32	2	30	7	19	25	4	17
MM40	10	1	9	2	7	8	4	7
MM41	14	1	13	3	8	10	2	8
MM42	3	2	1	0	1	1	0	1
MM43	1	0	1	0	1	1	0	1
MM44	1	0	1	0	1	1	0	1
MM45	1	0	1	0	1	1	0	1
MM46	0	0	0	0	0	0	0	0
MM47	1	0	1	0	1	1	0	1
MM48	1	0	1	0	1	1	0	1
MM49	7	2	5	2	3	4	0	3
MM50	1	0	1	1	0	0	0	0
MM51	0	0	0	0	0	0	0	0
MM52	0	0	0	0	0	0	0	0
MM53	0	0	0	0	0	0	0	0
MM54	1	1	0	0	0	0	0	0
MM55	16	2	14	3	8	11	2	8
MM56	6	1	5	1	3	5	0	3
Other Comment –not 'duly made'	36	-	-	-	-	-	-	-
TOTAL	520	56	426	139	219	292	49	182

(b) Policies map

Proposal Map				
	Number of Representations			
	Total received	Total in support	Total objecting	Comment
Proposal Map no.				
PM1	19			19
PM2	0			0
TOTAL	19			19

Table 3 - Main Issues Raised and Council's Response

Notes:

- Most points have been covered in responding to previous representations. In these instances, the Council will not be repeating its views.
- This provides a brief summary of the main issues raised through the representations and any points of clarification that Officers feel may be helpful to the Inspector in response to these. Its primary focus is therefore upon objections rather than statements of support.
- The response column sets out the views of Officers only, and has not been formally agreed with elected Members.

Main Issues / Concerns Raised	Officer Clarification response
MM1	
<ul style="list-style-type: none"> • Building in the Green Belt is illegal. • Gypsy and Traveller provision should be located elsewhere. • Concerns regarding infrastructure capacity and provision. • Concerns regarding impact on the Green Belt. • The lack of a definition of maximum capacity will lead to a 'free for all' and means infrastructure can't be sufficiently planned. • Plans should be halted. • Disproportionate change for the sake of bringing forward a few Gypsy and Traveller pitches. • There has been a lack of a robust search for alternative Gypsy and Traveller sites. • Accelerating aspects of LA3 to facilitate less than 5 G&T pitches (being LA3's 'share' of LA5's Allocation) is an unsound approach. 	<p>It is noted that not all comments relate to the modification proposed, but are more general expressions of concern regarding the Site Allocations DPD.</p>
MM2	
<ul style="list-style-type: none"> • Object to the relocation of the main hospital to Watford. • Council should focus on getting the hospital back, not building more houses. • Town can't sustain more homes without hospital. • Why is a school being allocated here when others in the town have recently been closed? • Concerns regarding overlooking and parking. • Don't want a hospital on this site, but at a site on Junction 20. • Use this site for a new arts venue instead. • Need to ensure there is still sufficient space to accommodate the required school. • If Council puts housing on this site it will be complicit in the decision to relocate the hospital to Watford. 	<p>A number of the comments result from a misunderstanding that the Council intends to increase the part of the site allocated for residential – to the detriment of the land earmarked for health use. This is not the case. The change just reflects new technical evidence which suggest that the existing area proposed for residential use will be able to be delivered at a higher density than originally envisaged – hence the overall numbers of units increasing.</p>
MM3	
<ul style="list-style-type: none"> • Concern at loss of hospital facilities at Hemel Hempstead and the fact that there are ambulance queues at Watford hospital. 	
MM4	
<ul style="list-style-type: none"> • Need more affordable housing and employment opportunities for new residents. 	<p>This comment does not appear to relate to the modification proposed (amending part of the Table of Out of Centre Retail Locations).</p>
MM5	
-	-

Main Issues / Concerns Raised	Officer Clarification response
MM6	
<ul style="list-style-type: none"> • Bringing LA3 site forward early will result in substandard development. • It is wrong to bring LA3 forward early just because the Gypsy and Traveller pitches at LA5 are to be deleted. • Infrastructure capacity and delivery concerns. • Concerns over environmental impact of the scheme. • Why has the 'up to 900 dwellings' approach been changed? • Delivery should not be 'as and when required' – that is too vague. • Very special circumstances to warrant release of Green Belt sites has not been demonstrated. • Grange Farm site in Bovingdon should be allocated and brought forward for development in addition to the Local Allocations. 	<p>The proposed modification relates to the timing of Local Allocations LA1 and LA3, rather than the details of the schemes.</p> <p>The Master Plans for the Local Allocations will be adopted alongside the Site Allocations DPD. These provide more detail on the constraints and required infrastructure associated with the developments in deciding/determining future planning applications.</p>
MM7	
<ul style="list-style-type: none"> • Requirement for Gypsy and Traveller pitches at LA5 demonstrates the fundamental flaw in the Councils conclusions that the Local Allocations are the right locations for pitches. • All 'reasonable alternatives' have not been considered for Gypsy and Traveller sites. • Why provide for Gypsies and Travellers who do not wish to locate here? • Enlarge the Three Cherry Trees site instead. • How can you just omit the Gypsy and Traveller provision from LA5? • Approach to accommodating Gypsies and Travellers is not consistent with Government policy. • Gypsy and Traveller site at LA5 should be reinstated. 	<p>Proposed modification deletes reference to the provision of Gypsy and Traveller pitches on site LA5, rather than to alter the Council's general approach to overall provision for Gypsy and Travellers.</p>
MM8	
<ul style="list-style-type: none"> • Advise caution when considering the Council's projected site capacities and completions data. 	
MM9	
<ul style="list-style-type: none"> • Should remain 'up to 900 homes'. • Concerns regarding 1,100 homes being proposed by the developer – this is a 22% increase (to 900) and is not acceptable. • Concern that sites will become the 'slums of tomorrow.' • Goes against the original concept of Hemel Hempstead as a 'garden city.' • Concern regarding the basis on which the housing projections are made. • Insufficient evidence to support increased dwelling numbers. • The capacity for the Gas Board site on London Road should be increased to c400 homes. • Concern that removing the maximum figure will not result in sustainable development. • Need to consider the designation of additional Green Belt land. • There has been insufficient investigation of potential brownfield land. • Lack of A&E facility at Hemel Hempstead hospital. • Council misled residents with 900 homes reference. • Council needs to serve residents not developers. • Insufficient local engagement to justify the increase in dwelling numbers. • Homes won't be for Hemel Hempstead residents. • Fringe development such as this will increase car use. • Concerns over infrastructure capacity and provision. • Traffic congestion will increase. • New doctor's surgery is needed in the first phase of development. 	<p>The reference to 1,100 dwellings at LA3 has arisen from a public consultation event carried out by the site developers as part of their pre-application preparations. This consultation involved a half day exhibition on the 6th February (a day after the Council's Main Modifications consultation closed). The developer's information is available at: http://www.westhemel.co.uk/. No planning application has been submitted for the site.</p> <p>This is a separate matter and does not relate to any Main Modifications proposed, although MM1, MM9 and MM41 would allow greater flexibility over capacities.</p>

Main Issues / Concerns Raised	Officer Clarification response
MM10	
<ul style="list-style-type: none"> • Council is abdicating responsibility by bringing LA3 forward because the Planning Inspector has ruled to delete the Gypsy and Traveller pitches at LA5. • Concerns regarding infrastructure capacity and delivery. • Concerns regarding environmental impact of development. • Gypsy and Traveller Needs Assessment is not up-to-date. • Grange Farm site in Bovingdon should be allocated and released for development. • It is not appropriate to remove land from the Green Belt. • Housing projections used are arbitrary. • Homes will not be for the residents of Hemel Hempstead. • LA3 should not be brought forward just to enable the provision of Gypsy and Traveller pitches. 	<p>Many of the comments received relate to general concerns regarding Green Belt releases and infrastructure capacities, rather than to the proposed modification itself.</p>
MM11	
-	-
MM12	
<ul style="list-style-type: none"> • Exceptional circumstances have not been demonstrated to justify the loss of the Green Belt, or its earlier release. 	<p>This proposed modification relates to the timing rather than principle of the development.</p>
MM13	
<ul style="list-style-type: none"> • Individual Gypsy and Traveller pitches should be scattered around LA3 site, not all located in one place. • Gypsy and Traveller site has been pushed through without sufficient chance for discussion. • Gypsies and Travellers planned for do not meet the current Government definition. • Need to update Gypsy and Traveller Needs Assessment. 	<p>This proposed modification relates to site LA1 Marchmont Farm, rather than LA3.</p>
MM14	
-	-
MM15	
<ul style="list-style-type: none"> • Change would allow developer to squeeze another bedroom into a house and make each plot smaller, leading to high density development. • A maximum height of two storeys should be imposed. 	-
MM16	
-	-
MM17	
<ul style="list-style-type: none"> • LA3 should be delayed until it is certain the necessary infrastructure can be upgraded. • Concerns regarding impact on water quality. 	<p>This proposed modification relates to site LA2 Old Town, Hemel Hempstead, rather than LA3.</p>

Main Issues / Concerns Raised	Officer Clarification response
<p>MM18</p> <ul style="list-style-type: none"> • There should be no access onto Chaulden Lane. • Modification doesn't go far enough to ensure greenspace within the site is managed in an ecologically friendly way. • Location of wildlife corridor is wrong. • Emphasis should be on protecting the existing reserve at Shrubhill. 	<p>The proposed modification does not relate to how LA3 is accessed.</p>
<p>MM19</p> <ul style="list-style-type: none"> • Location of the Gypsy and Traveller site still remains identified as 'potential.' • Gypsy and Traveller site isn't viable and doesn't meet the most recent Government definitions/guidelines. • Location of site is too segregated – it should be located in the heart of the development. • Should reinstate the proposed Gypsy and Traveller site at LA5. • Plans should be referred to as draft, as the precise location of the Gypsy and Traveller site has not been agreed. • Challenge suitability of LA3 as a location for Gypsy and Traveller provision over other reasonable alternatives. 	<p>Proposed modification does not make any changes to the notation regarding the Gypsy and Traveller site. This remains as set out in the submitted Site Allocations DPD. Its detailed location will be considered through the planning application process.</p> <p>The Master Plans for the Local Allocations will be adopted alongside the Site Allocations DPD. The master plans provide more detail on the constraints and required infrastructure associated with the developments when deciding/determining future planning applications.</p>
<p>MM20</p> <ul style="list-style-type: none"> • Concerns that accelerated delivery will mean that infrastructure issues are not able to be resolved. • Environmental impact will be enormous and more research is needed before development takes place. • Very special circumstances to justify releasing land from the Green Belt have not been demonstrated. • LA3 development will have a negative impact on Potten End • Brexit will change housing needs. • Site cannot be made available for development until after the master plan has been submitted for consultation. • Led to believe that there was a master plan being progressed, but reference to this seems to have been taken out of the policy. • No access should be allowed onto Chaulden Lane. • Insufficient justification given for change in timing. • Needs to be a master plan for the whole site which looks at all the elements, with proper consultation and agreement of this. • Wrong to announce changes to the document in the run-up to Christmas. • Elements of development shown as 'potential' so have not been suitably scrutinised. • Early delivery risks a sub-standard development. • Development has had inadequate preparation. • Traffic impact not fully considered. • The change to LA5 has resulted in unacceptable changes to LA3. • Infrastructure needs have not been fully addressed – especially schools, roads and hospital. • Too short a time frame allowed for comment. 	<p>Proposed modification relates to the timing of delivery of site LA3, not to any specific site requirements.</p> <p>There appears to be a misunderstanding that the Council is not progressing a master plan for this site. This is not the case. The master plans have been subject to consultation and will be adopted alongside the Site Allocations DPD. The master plans provide more detail on the constraints and required infrastructure associated with the developments when deciding/determining future planning applications.</p>

Main Issues / Concerns Raised	Officer Clarification response
<p>MM21</p> <ul style="list-style-type: none"> • Phased development is essential to the delivery of sustainable development. • Gypsy and Traveller needs could be accommodated elsewhere in the Borough – either temporarily or permanently. • Concern over impact on infrastructure of earlier release – especially utilities, transport and environmental concerns. • Earlier release of the site risks substandard development, to the detriment of new and existing residents. • Should be noted that the Gypsy and Traveller location remains labelled as ‘potential.’ • Don’t consider Gypsy and Traveller site to be viable. • Allocation of Gypsy and Traveller site does not comply with most recent Government guidance. • Insufficient consideration given to alternative sites. • Need to complete new Gypsy and Traveller Needs Assessment before taking a decision on this site. • Vital that an outline application is submitted for this site so it is clear what is planned for and where. • Modification should refer to Gypsy and Traveller pitches being delivered during the planning application stage. • Early release of the site is being based on technical issues rather than sound planning principles. • Need an outline planning application in order to assess the best location for Gypsy and Traveller site. • Gypsy and Traveller site has moved from ‘potential’ to ‘proposed’ with no consultation. • Impact of Gypsy and Traveller site on Winkwell / Pouchen End conflicts with national policy. • Bringing the Gypsy and Traveller element forward in an early phase won’t help integration with the wider area – neither will its location. • Consider that these changes are being made in order to justify the whole LA3 site being accessed directly off the A41, via Winkwell. • Inadequate road access. • Master plan does not appear to be in the public domain. • Concern that there will no longer be a master plan. • Request reference is added into the modification allowing for the development to be in ‘broad compliance’ with the master plan to allow for the necessary flexibility within the policy. • Earlier release of sites has not been justified by exceptional circumstances and is therefore contrary to national policy. • Gypsy and Traveller site should not be located within existing communities. • Gypsy and Traveller site should not be a driver for the LA3 development. • Gypsy and Traveller needs should be considered in the context of the whole site. • Accelerating aspects of LA3 to facilitate less than 5 G&T pitches (being LA3’s ‘share’ of LA5’s Allocation) is an unsound approach. 	<p>The proposed modification relates to the timing of the Gypsy and Traveller provision, rather than the principle of its inclusion within the site. The pitches at LA3 are required in order to meet identified need. Detailed site issues will be considered through the planning application process.</p>
<p>MM22</p> <ul style="list-style-type: none"> • Believe commitment to provide Gypsy and Traveller pitches early in this development will ‘key in’ this provision to the whole development. • Failure to put Gypsy and Traveller pitches at LA5 should not result in less rigorous process at LA3 as the wording implies. • Object to the impact on infrastructure provision of such a large new development – needs further public consultation. • Concerned that early provision of the Gypsy and Traveller site would enable direct access for the whole site from the A41 via Winkwell. • Proposal is unacceptable and not in line with most recent Government guidelines. 	<p>This proposed modification relates to a factual clarification regarding the CIL zone in which the development is located – not to any wider site issues.</p>

Main Issues / Concerns Raised	Officer Clarification response
MM23	
<ul style="list-style-type: none"> • Amendment to provide a smaller site at LA5 is resulting in unacceptable changes to the timing of LA3. • Earlier release does not allow for all infrastructure issues to be resolved. • Environmental impact will be enormous – especially on the Bulbourne and Gade catchments. • Bringing forward development earlier will have catastrophic effect on existing as well as new homes. • Concerns that a plan has not been put in place with Thames Water. • This change may go some way to ensuring the impact on existing infrastructure is considered. • Government needs to build new reservoirs to cope with increased housing demand. • What is being proposed here is considered to be unacceptable. 	<p>This proposed modification relates to amended text regarding the need for early liaison with Thames Water, rather than any wider changes to the proposal at LA3.</p>
MM24	
<ul style="list-style-type: none"> • Modification fails to provide sufficient emphasis on the importance of maintaining the tree line as a means of protecting the Green Belt. • Modification is inadequate as it refers to a master plan that inadequately protects and strengthens the new Green Belt boundary, especially as this will be put in place when the site is released. 	<p>The proposed modification relates to securing a comprehensive form of development.</p>
MM25	
<ul style="list-style-type: none"> • Welcomes requirement for contributions towards offsetting, but protection of existing wildlife would be more effective with an additional reference to protecting existing mature trees via TPO. 	<p>A TPO is now in place on the site. The Master Plan will be updated to reflect this.</p>
MM26	
-	-
MM27	
<ul style="list-style-type: none"> • Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. • Replacement text would facilitate development that is not appropriate in the western field's area. 	-
MM28	
<ul style="list-style-type: none"> • Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. • Support modification as Gypsy and Traveller site is inappropriate in the Green Belt and AONB. 	-
MM29	
<ul style="list-style-type: none"> • Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. 	-

Main Issues / Concerns Raised	Officer Clarification response
MM30	
<ul style="list-style-type: none"> Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. Concern regarding the location of the children's play facility in the AONB, and that if it is well used there will be pressure for its extension and for associated buildings. The future management of the site will be very important. 	<p>There are no proposals in the Site Allocations DPD for any buildings associated with the children's play area within LA5. If there were any future changes to the facilities, these would need to be considered against national and local policies at the planning application stage.</p>
MM31	
<ul style="list-style-type: none"> Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. 	-
MM32	
<ul style="list-style-type: none"> Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. Replacement text would facilitate development that is not appropriate in the western field's area. 	-
MM33	
<ul style="list-style-type: none"> Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. Support deletion of reference to Gypsy and Traveller provision. 	-
MM34	
<ul style="list-style-type: none"> Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. Object to fact that as a local resident they have not been notified that this land is to be taken out of the Green Belt. 	<p>The proposed modification does not seek additional land to be removed from the Green Belt. As a result of the deletion of the traveller site, the land is no longer required to be released from the Green Belt.</p>
MM35	
<ul style="list-style-type: none"> CALA support the overall objective of the proposed Modification, but in order to ensure it is 'positively prepared' request the words 'comprehensive approach' are deleted, as they consider it adds ambiguity, when it is already acknowledged in the draft master plan that there will be a phased approach to delivery. 	<p>Reference to comprehensive approach is considered essential to ensure the scheme is planned as a whole, even if it is delivered as a phased scheme.</p>
MM36	
-	-
MM37	
<ul style="list-style-type: none"> Whiteacre highlight the other constraints pertaining to the LA6 site that have not been adequately researched and which cast doubt over the deliverability of the site. Their site at Grange Farm, Bovingdon, is a proven alternative / additional site that is available for immediate delivery. 	<p>This proposed modification relates to amended text regarding the need for early liaison with Thames Water, rather than any wider changes to the proposal at LA6.</p>

Main Issues / Concerns Raised	Officer Clarification response
<p>MM38</p> <ul style="list-style-type: none"> • Not practical to locate the Gypsy and Traveller site where the 'potential' location is shown on the map. • Other more appropriate locations need to be considered for Gypsy and Traveller provision within the Borough. • Suggest that a new Gypsy and Traveller Needs Assessment should be completed before a decision is made on the Site Allocations DPD. • Lack of Gypsy and Traveller Needs Assessment underlines the fact that the plan is flawed. • Government's Planning Policy for Traveller Sites (PPTS) (2015) has not been understood. Potential locations for Gypsy and Traveller sites would fall foul of this policy – especially regarding access. • Support the adoption of the PPTS (2015) in the proposed changes, but feel that Government guidelines are not sufficiently reflected in the site plan. • The strategy should set out that full consultation should take place when there is a firm site proposal. • Removing the Gypsy and Traveller allocation from LA5 due to its location in the AONB is contrary to the Equality Act. • There has been no consultation of the local community and other stakeholders in the area regarding the potential location of the Gypsy and Traveller site. • Travellers site should not be developed in isolation. • The roads will not be able to cope with the additional traffic. • The Gypsy and Traveller site will not have sufficient access to roads, education, etc. • Gypsy and Traveller sites should not be located in existing communities. • Objecting to the inclusion of a reference allowing the site to be made available for early delivery, as very special circumstances have not been demonstrated. • Lack of detail regarding the Gypsy and Traveller site means that it has not been subject to sufficiently rigorous scrutiny. • Gypsy and Traveller site will have insufficient access to LA3 and its facilities. 	<p>This proposed modification relates to factual updates to the supporting text in the Site Allocations DPD following the deletion of the traveller site at LA5. The pitches at LA1 and LA3 are required in order to meet identified need. Detailed site issues will be considered through the planning application process.</p>
<p>MM39</p> <ul style="list-style-type: none"> • There should be a sensible resolution to the LA5 Gypsy and Traveller issues, as the current decision is unsound. • The ability to amend Policy SA9 at this stage confirms that unsound decisions can be remedied and should be done so in this regard (i.e. LA3). • Concern about the deletion of the Gypsy and Traveller site on LA5 leading to the LA3 site being bought forward sooner. This puts the scheme at risk of being substandard. • Further exceptions must be made to resolve the use of Green Belt land for Gypsy and Traveller sites. • It is not in keeping with the Equality Act to delete Gypsy and Traveller provision from this area. • Requirement to omit Gypsy and Traveller pitches from LA5 highlights a fundamental flaw in the approach adopted by Dacorum Borough Council. Need to look again at 'reasonable alternatives.' • Chiltern Conservation Board supports the Main Modification as it will help ensure the Site Allocations DPD is compatible with the purposes of the AONB designation. 	<p>This proposed modification relates to a factual update to Policy SA9 following the deletion of the traveller site at LA5.</p>

Main Issues / Concerns Raised	Officer Clarification response
MM40	
<ul style="list-style-type: none"> • Amendment to provide a smaller site at LA5 is resulting in unacceptable changes to the more complex LA3 site. • Concern that there is not sufficient time to remedy the infrastructure issues at LA3. • Environmental impact will be enormous. • Concern that early release will result in substandard development at LA3. • Feel that all previous consultation feedback has been ignored. • Not appropriate to remove LA3 from the Green Belt in the first place and there is inadequate time for research into necessary infrastructure needs and upgrades. • Proposal fails to take account of Government policy on protecting the Green Belt. Housing need is not sufficient reason for building on the Green Belt. • Support earlier release of LA3 to help boost 5 year land supply. 	<p>The estimated capacity for LA3 remains at 900 homes. Any change in the capacity can be tested through the planning application process. However, proposed modifications MM1, MM9 and MM41 explain that capacities are not to be treated as maxima.</p>
MM41	
<ul style="list-style-type: none"> • Plans have consistently used the phrase 'up to 900' homes. Developers are now proposing 1,100 – a 22% increase. This is not acceptable, due to impact on infrastructure etc. • High density, small houses is not what is needed. • Number of units should be a maximum. • The Council should not 'bow to the whims' of developers. • Further consultation needed on proposals due to a 22% increase. • Proposals will open floodgates for developers to all increase their numbers. • It is right that final development capacities are tested through the planning application process. • Advise caution on the Council's projected numbers. 	
MM42	
<ul style="list-style-type: none"> • Note that amended wording supports increased density where this protects local character. Need to ensure this is considered against setting and significance of any heritage asset and the wider historic environment. • 900 homes should be the maximum. This change makes a bad situation worse in terms of infrastructure capacities etc. • Gas Board site on London Road, Hemel Hempstead could accommodate an even higher level of new homes than allocated i.e. in excess of 400. 	<p>These proposed modifications do not relate to site LA3.</p>
MM43	
<ul style="list-style-type: none"> • Plans have consistently used the phrase 'up to 900' homes. Developers are now proposing 1,100 – a 22% increase. This is not acceptable, due to impacts on infrastructure etc. 	
MM44	
<ul style="list-style-type: none"> • Plans have consistently used the phrase 'up to 900' homes. Developers are now proposing 1,100 – a 22% increase. This is not acceptable, due to impacts on infrastructure etc. 	
MM45	
<ul style="list-style-type: none"> • Plans have consistently used the phrase 'up to 900' homes. Developers are now proposing 1,100 – a 22% increase. This is not acceptable, due to impacts on infrastructure etc. 	

Main Issues / Concerns Raised	Officer Clarification response
MM46 <ul style="list-style-type: none"> Plans have consistently used the phrase 'up to 900' homes. Developers are now proposing 1,100 – a 22% increase. This is not acceptable, due to impacts on infrastructure etc. 	These proposed modifications do not relate to site LA3.
MM47 <ul style="list-style-type: none"> Plans have consistently used the phrase 'up to 900' homes. Developers are now proposing 1,100 – a 22% increase. This is not acceptable, due to impacts on infrastructure etc. 	
MM48 <ul style="list-style-type: none"> Plans have consistently used the phrase 'up to 900' homes. Developers are now proposing 1,100 – a 22% increase. This is not acceptable, due to impacts on infrastructure etc. 	
MM49 <ul style="list-style-type: none"> The need to accelerate the release of the site has not been demonstrated. Exceptional circumstances for Green Belt development have not been proven. Plans have consistently used the phrase 'up to 900' homes. Developers are now proposing 1,100 – a 22% increase. This is not acceptable, due to impact on infrastructure etc. Agree the net capacity should be fixed at 900 homes. The site would not be able to cope with 1,100 homes now being proposed by the developers. More lead in time is needed. Infrastructure concerns. Welcome the inclusion of LA5 in Part 1 of the Housing Schedule and deletion of the Gypsy and Traveller requirements. 	-
MM50 <ul style="list-style-type: none"> Whiteacre welcome the Council's acceptance that it must bring sites forward sooner, but there should be an additional release of the land at Grange Farm, Bovingdon, which is available for immediate development. 	-
MM51	
-	-
MM52	
-	-
MM53	
-	-
MM54	
<ul style="list-style-type: none"> Proposed modification to replace reference to Sport England 'standards' with 'guidance' is welcomed as this more accurately reflects the true position. 	-

Main Issues / Concerns Raised	Officer Clarification response
<p>MM55</p> <ul style="list-style-type: none"> Abdication of good management by Dacorum Borough Council to bring forward LA3 early simply because the Planning Inspector has ruled out the Gypsy and Traveller site at LA5. Concern that earlier delivery of LA3 will lead to substandard delivery, and be disastrous for new and existing residents. Concern regarding infrastructure capacity – especially hospitals, roads, education, water, plus the impact on the Green Belt. Environmental impact will be enormous. Need better lead in time to ensure development is the best it can be. Need to add ‘including an agreed outline plan.’ The proposed wording ‘should certain criteria be met’ is inadequate. The proposed criteria should refer to a properly agreed plan that is subject to public consultation. Detail the criteria and justification for such a modification, together with a detailed options appraisal. Support the change which allows LA3 to be delivered prior to 2021. Support inclusion of LA5 in Part 1 of housing schedule. 	-
<p>MM56</p> <ul style="list-style-type: none"> Abdication of good management by Dacorum Borough Council to bring forward LA3 early simply because the Planning Inspector has ruled out the Gypsy and Traveller site at LA5. Concern that change will result in LA3 being substandard, with a detrimental impact on new and existing residents. Dacorum’s planning system has been haphazard and the development of a new single Local Plan is welcomed. LA3 should not start until this new plan has been prepared. Loss of large areas of Green belt is unsound and contrary to national policy. No credible evidence to support earlier release of sites. 	The proposed modification updates the text regarding the preparation of the Council’s new Local Plan, rather than setting out any changes to particular proposals within the current Site Allocations DPD.
<p>Other</p> <ul style="list-style-type: none"> Master plan for LA3 is required and needs to be published for further consultation before going forward with a detailed scheme. Concern over the location of the Gypsy and Traveller site proposed on LA3 – particularly with regard to access onto Chaulden Lane. Concerned about the effect of the LA3 development on Winkwell. Residents should be able to comment specifically on the Gypsy and Traveller element of LA3. House was purchased in Chaulden Lane on basis that it was surrounded by Green Belt. Understood that Gypsy and Traveller provision was not going to be introduced to existing communities. Concerned that MM21 seems to take out requirement for a masterplan for LA3. Concern regarding ambiguous statement regarding overall numbers for LA3. Concern that developers now seem to be planning 1,100 homes at LA3. Concern that the developer’s own consultation ends the day after the consultation closed on the Main Modifications. Drayton Beauchamp Parish meeting are concerned about the impact of the LA5 development on the Green Belt and AONB locally. No exceptional circumstances have been demonstrated for the cemetery to be removed from the Green Belt at LA5. Draw Inspector’s attention to another potential development site to the west of Piccotts End (site details attached). Gypsy and Traveller site location in LA3 means it will no longer have any access to the site’s services and facilities – location of site requires further consultation Bringing forward LA3 without an outline plan is contrary to Government requirements. LA3 development is not sustainable. Object to location of a Gypsy and Traveller site in LA3. 	Detailed site issues at LA3 and LA5 will be considered through the planning application process. Access points for site LA3 have not been amended through these proposed modifications, but remain as set out Policy LA3.

Main Issues / Concerns Raised	Officer Clarification response
<ul style="list-style-type: none"> • Parliaments and Councils should work for communities, not against them. • Insufficient consideration of infrastructure issues for LA3. • Access to Gypsy and Traveller site has changed and is now from Winkwell, this is not acceptable. • Why can Gypsy and Traveller provision at LA5 be shelved, but not at LA3? • Pix Farm Lane and Winkwell swing bridge cannot cope with additional traffic from LA3. • Detrimental impact of LA3 development on local house prices. • Concerns that the potential location for the Gypsy and Traveller site at LA3 is not included in the overall plan. • Proposals for LA3 have not been carried out in a fair, duly considered and consultative process. • Council and local MP need to make sure that the infrastructure in the local area can cope with the increased demand. • Environment Agency has no comments to make. • Luton Airport has no comment to make. • Network Rail has no comment to make. 	

Table 4 – Responses not considered in the Report of Representations N/A

(a) List of those making 'No Comment'

None

(b) List of those making comments on the Sustainability Appraisal(incorporating Strategic Environmental Assessment)

None