Shaping growth in Dacorum

Site Selection Topic Paper

Dacorum Local Plan (2020-2038)
Emerging Strategy for Growth
November 2020

DACORUM BOROUGH COUNCIL

Background Topic Papers

Introduction

A series of background topic papers have been prepared to support the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth consultation. These are as follows:

- **Climate Change and Sustainability**
- **The Development Strategy**
- **Housing**
- **Site Selection**
- **The Green Belt & Rural Area**
- **Employment**
- **Retail and Town Centres**
- **Transport and Connectivity**
- **Open Space, Sport and Leisure**
- **Chilterns Beechwoods SAC**

These papers form part of the evidence base and are intended to make it easier to understand how the Council's emerging approach developed, including any conclusions reached at this stage.

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1. Introduction

1.1 The Borough is facing challenging pressures for new development over the next 20 years which it must tackle through its Local Plan. In particular, the need for homes, employment land and associated infrastructure is much higher than faced by previous Plans yet this has to be planned for in the context of the same extensive planning and environmental constraints. Thus the Plan must demonstrate how the approach to site selection takes into account the many constraints and opportunities of the Borough.

1.2 This topic paper provides a summary of how (residential-led) site selection for the Local Plan has emerged and what has influenced that decision. It explains what the Plan took into account in developing the approach and how it has narrowed down reasonable site options resulting in the recommendation of draft allocations, having regard to the following important stages:

- evidence base preparation;
- feedback from the Issues and Options consultation;
- ongoing engagement with key stakeholders and meeting its obligations under the Duty to Cooperate; and
- testing of options through the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment and Habitats Regulations Assessment.

1.3 This topic paper is published for consultation alongside the draft Plan for consultation. It should be read in conjunction with a series of related and complementary topic papers that explain the Plan's overall policies, visions and objectives.

1.4 The methodology and sites considered will be reviewed following consultation and an updated Topic Paper will be made available alongside the publication stage of the Local Plan (Regulation 19).

2. Policy Context

2.1 The preparation of the new Local Plan, particularly in developing a spatial strategy for the Borough, has been influenced by a broad national, strategic and local policy context.

National Planning Policy Framework

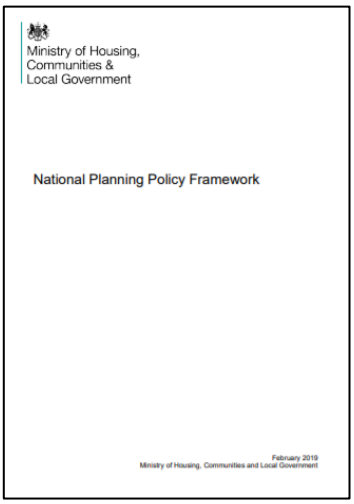


Figure 1 - NPPF

2.2 National advice on housing is provided through the National Planning Policy Framework (NPPF), with further guidance through the National Planning Practice Guidance (PPG). There are many elements of the NPPF that influence the selection and allocation of sites and these are summarised below.

2.3 At the heart of the NPPF is the presumption in favour of sustainable development. For plan-making this means that:

"a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."[1]

2.4 Chapter 3 of the NPPF solely relates to **plan making**, and the following key points are important for understanding the context for site selection in Dacorum:

- Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities[2];
- Plans should be prepared positively, in a way that is aspirational but deliverable[3];

[1] NPPF, MHCLG, Feb 2019, Paragraph 11
[2] NPPF, MHCLG, Feb 2019, Paragraph 15
[3] NPPF, MHCLG, Feb 2019, Paragraph 16 (b)

- Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees[4];
- The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area[5].
- Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development[6].
- Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure[7].
- Strategic polices should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)[8].

2.5 The NPPF states that all policies *"should be underpinned by relevant and up-to-date evidence which should be adequate and proportionate, focussed tightly on supporting and justifying the policies concerned, and take into account relevant market signals"*[9].

2.6 The NPPF also highlights the importance for plans and spatial development strategies to be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements, including how it has addressed relevant economic, social and environmental objectives[10].

2.7 With this, the NPPF is clear that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where this is unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

2.8 When the Local Plans are examined they must have been prepared in accordance with legal and procedural requirements, and satisfy the test of "soundness" (para. 35). Plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other

[4] NPPF, MHCLG, Feb 2019, Paragraph 16 (c)
[5] NPPF, MHCLG, Feb 2019, Paragraph 17
[6] NPPF, MHCLG, Feb 2019, Paragraph 20
[7] NPPF, MHCLG, Feb 2019, Paragraph 22
[8] NPPF, MHCLG, Feb 2019, Paragraph 23
[9] NPPF, MHCLG, Feb 2019, Paragraph 31
[10] NPPF, MHCLG, Feb 2019, Paragraph 32

authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2.9 Chapter 5 of the NPPF sets the framework for **housing** delivery, including Government's objective to significantly boost the supply of homes[11]. Key elements to consider in this chapter include the following:

- To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach[12];
- A housing requirement figure for the whole area should be established, and strategic policies should also set out a housing requirement for designated neighbourhood areas which reflect the overall strategy for the pattern and scale of development and any relevant allocations[13];
- Local planning authorities should have a clear understanding of land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability[14];
- Planning policies should identify a supply of
    - Specific, deliverable sites for years one to five of the plan period, with an appropriate buffer; and
    - Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- Recognise the important role that small and medium sized sites make to meeting housing requirements, particularly as they can be delivered relatively quickly. Local Plans should identify land which accommodates at least 10% of their housing requirement on sites no larger than one hectare[15];
- Support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes[16]; and
- There needs to be compelling evidence that windfall sites will provide a reliable source of housing supply. Any windfall allowance should be realistic having

[11] NPPF, MHCLG, Feb 2019, Paragraph 59
[12] NPPF, MHCLG, Feb 2019, Paragraph 60
[13] NPPF, MHCLG, Feb 2019, Paragraph 65
[14] NPPF, MHCLG, Feb 2019, Paragraph 67
[15] NPPF, MHCLG, Feb 2019, Paragraph 68
[16] NPPF, MHCLG, Feb 2019, Paragraph 68 (c)

regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends[17].

- Recognition that larger numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities[18]. It is also notes that delivery timescales for larger sites need to be realistic.
- Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and local planning authorities can consider if such policies should also consider likely rates for specific sites[19].
- The supply of specific deliverable sites should include a buffer of between 5-20% which is carried forward from later in the plan period[20].
- In rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, but policies should avoid the development of isolated homes in the countryside, except in certain circumstances[21].

2.10 Chapter 7 of the NPPF recognises the important role that residential development plays in ensuring the **vitality of town centres** and that policies should encourage residential development on appropriate sites.

2.11 Chapter 8 **promotes healthy and safe communities** and for policies to deliver new open space, sport and recreation facilities, taking into account any deficits or surpluses[22]. Policies should also protect and enhance public rights of way and access[23].

2.12 Chapter 9 **promotes sustainable transport**. Within this, it sets out that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. It recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas[24].

2.13 It adds that policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. High quality walking and cycling networks should also be identified alongside any sites or routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development[25].

[17] NPPF, MHCLG, Feb 2019, Paragraph 70
[18] NPPF, MHCLG, Feb 2019, Paragraph 72
[19] NPPF, MHCLG, Feb 2019, Paragraph 73
[20] NPPF, MHCLG, Feb 2019, Paragraph 73
[21] NPPF, MHCLG, Feb 2019, Paragraph 79
[22] NPPF, MHCLG, Feb 2019, Paragraph 96
[23] NPPF, MHCLG, Feb 2019, Paragraph 98
[24] NPPF, MHCLG, Feb 2019, Paragraph 103
[25] NPPF, MHCLG, Feb 2019, Paragraph 104

2.14 Chapter 11 seeks to make **effective use of land**. It states that policies should encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains[26]. Plan should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs[27].

2.15 Where there is no reasonable prospect of land coming forward for the use allocated in the existing plan, these should be reallocated for a more deliverable use that can help to address identified needs, or if appropriate, deallocate a site which is undeveloped[28].

2.16 Additionally, Chapter 11 expands upon achieving appropriate densities, noting that policies should avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. With this, policies should include the use of minimum density standards for town centres and other locations that are well served by public transport. Such standards should seek a significant uplift in the average density of residential development within these areas[29].

2.17 Chapter 13 of the NPPF focusses on **protecting Green Belt land**. Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans, having regard to their intended permanence in the long term, so they can endure beyond the plan period[30].

2.18 Before concluding that changes should be made to the Green Belt, the following must be considered:

- Make as much use as possible of suitable brownfield sites and underutilised land;
- Optimise the density of development in line with Chapter 11, including whether policies promote a significant uplift in minimum density standards in town centres and other locations well served by public transport; and
- Informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground[31].

2.19 The NPPF also notes that local planning authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary[32].

[26] NPPF, MHCLG, Feb 2019, Paragraph 118
[27] NPPF, MHCLG, Feb 2019, Paragraph 119
[28] NPPF, MHCLG, Feb 2019, Paragraph 120
[29] NPPF, MHCLG, Feb 2019, Paragraph 123
[30] NPPF, MHCLG, Feb 2019, Paragraph 136
[31] NPPF, MHCLG, Feb 2019, Paragraph 137
[32] NPPF, MHCLG, Feb 2019, Paragraph 138

2.20 Where it has been concluded that land is to needed to be released from the Green Belt, the NPPF makes clear that first consideration should be given to land which has been previously developed and/or is well served by public transport, and for compensatory improvements to be made to the environmental quality and accessibility of remaining Green Belt land[33].

2.21 Chapter 14 deals with **the challenge of climate change and flooding**. In this, policies should consider identifying suitable areas for renewable and low carbon energy sources, and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems[34]. On flooding, the NPPF is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk[35].

2.22 It notes that all plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property[36]. Development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding, and a strategic flood risk assessment will provide the basis for applying this test[37].

2.23 The NPPF notes that if following the sequential test, it is not possible for development to be located in zones with a lower risk of flooding, then the exception test may have to be applied. Paragraphs 159-161 of the NPPF set the detail on what is required in order to satisfy the exception test for development to be allocated.

2.24 Chapter 15 sets the national policy context for **conserving and enhancing the natural environment**. Key elements within this section include the following:

- Protect and enhance valued landscapes, sites of biodiversity or geological value and soils[38];
- Minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks[39];
- Prevent new development from contributing to, being at unacceptable risk from, or adversely affected by, unacceptable levels of soil, air, water or noise pollution[40];

[33] NPPF, MHCLG, Feb 2019, Paragraph 138
[34] NPPF, MHCLG, Feb 2019, Paragraph 151
[35] NPPF, MHCLG, Feb 2019, Paragraph 155
[36] NPPF, MHCLG, Feb 2019, Paragraph 157
[37] NPPF, MHCLG, Feb 2019, Paragraph 158
[38] NPPF, MHCLG, Feb 2019, Paragraph 170 (a)
[39] NPPF, MHCLG, Feb 2019, Paragraph 170 (d)
[40] NPPF, MHCLG, Feb 2019, Paragraph 170 (e)

- Where appropriate, remediate and mitigate contaminated and unstable land[41];
- Plans should allocate land with the least environmental or amenity value[42];
- Great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which has the highest status of protection. The scale and extent of development within this designated area should be limited[43];
- Plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity[44];
- On ground conditions, the NPPF makes clear that policies should ensure that sites are suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination, including risks arising from natural hazards or former activities[45]; and
- On air quality, policies should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified[46].

2.25 Chapter 16 sets the policy context for **conserving and enhancing the historic environment**. It makes clear that heritage assets range from sites and buildings of local historic value to those of the highest significance and are an irreplaceable resource. Such assets should be conserved in a manner appropriate to their significance[47].

2.26 Plans should set a positive strategy for the conservation and enjoyment of the historic environment. When considering the impact of a proposed development on the significance of the designated heritage assets, great weight should be given to the asset's conservation. Any harm to, or loss of, the significance of a designated heritage assets (from its alteration or destruction, or from development within its setting), should require clear and convincing justification[48].

2.27 The NPPF also notes that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance.

2.28 The NPPF comprehensively identifies a range of constraints and opportunities with respect to the selection of sites for allocation in a Local Plan, covering the three key strands of sustainability, which have been taken into account as part of the process of allocating sites in the new Local Plan to 2036.

[41] NPPF, MHCLG, Feb 2019, Paragraph 170 (f)
[42] NPPF, MHCLG, Feb 2019, Paragraph 171
[43] NPPF, MHCLG, Feb 2019, Paragraph 172
[44] NPPF, MHCLG, Feb 2019, Paragraph 174 (b)
[45] NPPF, MHCLG, Feb 2019, Paragraph 178
[46] NPPF, MHCLG, Feb 2019, Paragraph 181
[47] NPPF, MHCLG, Feb 2019, Paragraph 184
[48] NPPF, MHCLG, Feb 2019, Paragraph 193

Planning Practice Guidance

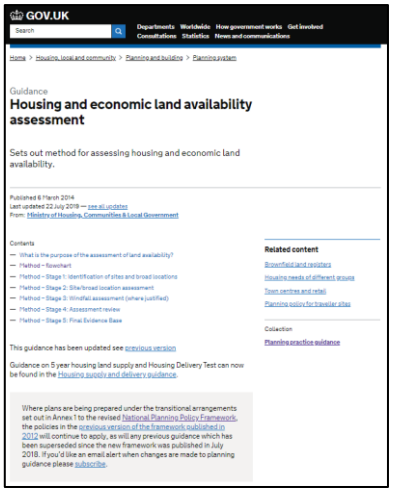


Figure 2 - Extract from the PPG

2.29 The National Planning Practice Guidance (PPG) is a comprehensive list of guidance produced by the Ministry of Housing, Communities and Local Government that is available online and is subject to regular review and updates[49].

2.30 It contains a number of important sections relevant to the preparation of Local Plans, the selection of sites for allocation, and expands upon many of the chapters and policies set out in the NPPF as described above.

2.31 Key guidance on site selection is set out in the section - **Housing and economic land availability assessment**[50] which aligns with Paragraph 67 of the NPPF.

2.32 In this section, the PPG clarifies that the assessment identifies a future supply of land which is suitable, available and achievable for housing development over the plan period. It notes that the assessment should not in itself determine what sites should be allocated, but to provide information on the range of sites which are available to meet local requirements[51].

2.33 The PPG sets out a five stage approach to the assessment. The flowchart on the next page appropriately summarises the key steps in this process.

2.34 The PPG provides detailed guidance on each of these stages, and forms the basis for any such evidence gathering exercise. Broadly speaking, much of the assessment work is undertaken in the first three stages. Stage four is a simple comparison of outputs against the housing requirement to see if needs can be met. Where needs cannot be met, the approach to the assessment should be reviewed.

2.35 Where the assessment concludes that there is a sufficient supply of sites to meet future needs, it can then inform the next steps of preparing the development plan, or in this instance the new Local Plan.

[49] National Planning Practice Guidance (PPG), available to view online at: https://www.gov.uk/government/collections/planning-practice-guidance
[50] PPG, section on Housing and economic land availability assessment, available to view online at: https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment
[51] PPG, section on Housing and economic land availability assessment, Reference ID: 3-001-20190722

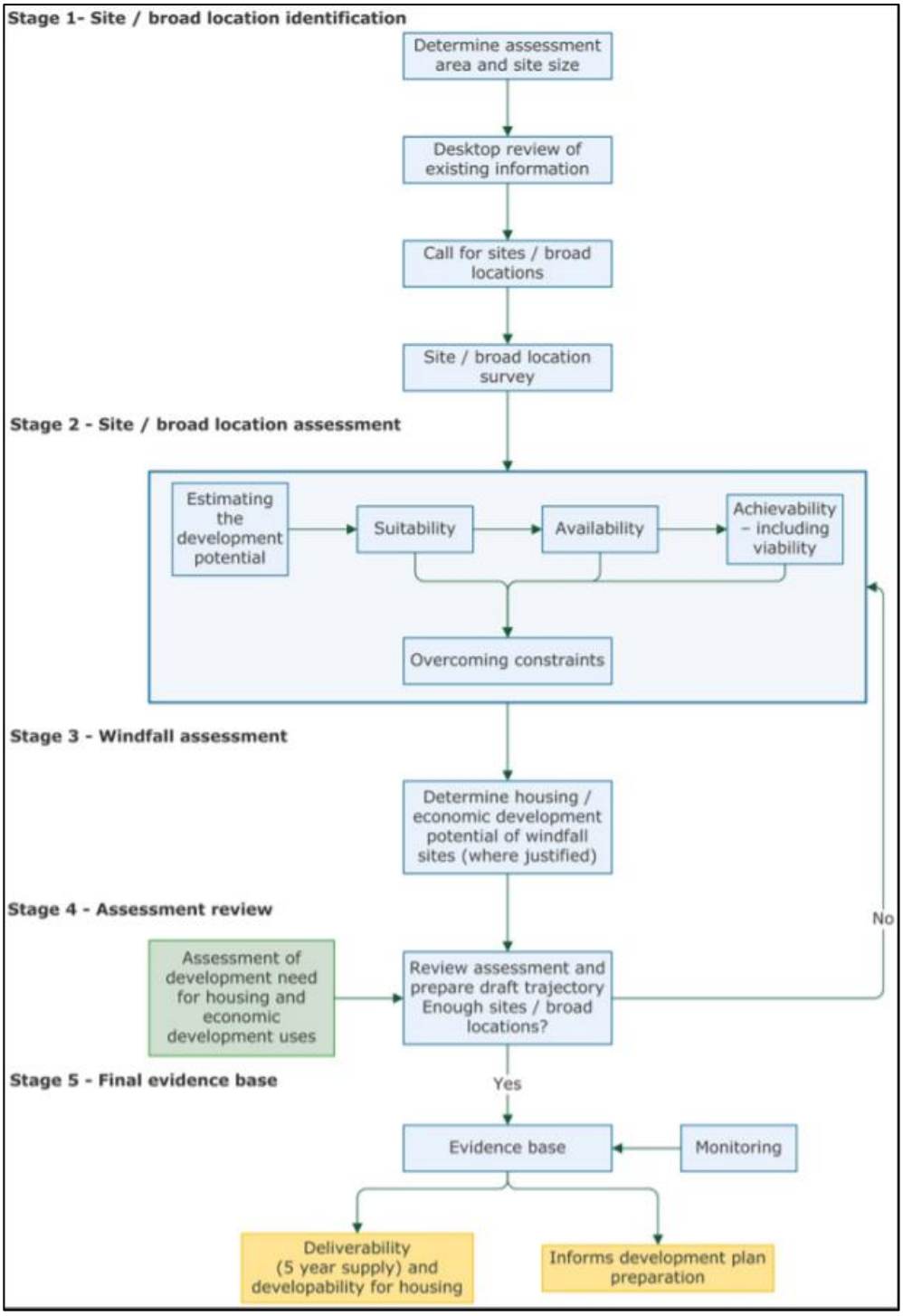


Figure 3 - PPG Methodology Flowchart[52]

2.36 The PPG contains a wide range of other sections that are relevant to site selection and relate closely to areas of the NPPF summarised above. While not repeated in detail here, these include:

[52] PPG, section on Housing and economic land availability assessment, Methodology Flowchart, available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/578755/land-availability.pdf

- Air quality;
- Appropriate Assessment;
- Climate change;
- Effective use of land;
- Flood risk and coastal change;
- Green Belt;
- Historic environment;
- Housing and economic needs assessment;
- Housing supply and delivery;
- Land affected by contamination;
- Land stability;
- Natural environment;
- Neighbourhood planning;
- Noise;
- Open space, sports and recreation facilities public rights of way and local green space;
- Permission in principle;
- Plan-making;
- Strategic environmental assessment and sustainability appraisal;
- Town centres and retail;
- Transport evidence bases in plan making and decision taking;
- Tree Preservation Orders and trees in conservation areas;
- Viability; and
- Water supply, wastewater and water quality.

Joint Strategic Plan (JSP)

2.37 Dacorum has a substantial history of co-ordinated working on planning issues and its evidence base, with adjoining districts. It has agreed with St Albans, Three Rivers, Watford and Hertsmere and Hertfordshire County Council (HCC) to prepare a place growth and development Plan (Joint Strategic Plan) up to 2050 for South West Hertfordshire. This includes a signed Memorandum of Understanding between the partners. The authorities secured planning delivery funding from MHCLG to deliver the JSP.

2.38 The five districts and HCC are currently carrying out high-level visioning work. Two major and complementary projects are underway: a strategic growth location study and a multi modal transport study. Both studies are due to report in spring 2020.

2.39 Given the time horizon of the JSP, it will not influence how the Council prepares the development strategy.

Local Plan Context

2.40 The following development plan documents will be replaced by the new Local Plan:

- Dacorum Borough Local Plan 1991-2011 (adopted April 2004) (saved policies);
- Dacorum Core Strategy (adopted September 2013); and
- Dacorum Site Allocations DPD (adopted July 2017).

2.41 There is one “made” Neighbourhood Plan (covering the neighbourhood of Grovehill in Hemel Hempstead). At present (November 2020), two other plans are being prepared for the parishes of Bovingdon and Kings Langley.

2.42 With respect to this topic paper, the most relevant existing policies include those which support previous allocations.

Other Local Strategies

Climate Change Emergency

2.43 The Council, along with other local authorities in the UK, has declared that there is a climate change emergency that requires urgent planning and action. This will include a number of actions:

- That we work towards ensuring that the full range of council activities are net carbon neutral by 2030.
- That an action plan will be developed as soon as possible.
- That we ensure all services make the maximum possible impact in challenging the extent and causes of climate change. The developing new Local Plan will incorporate the maximum possible sustainability requirements that the system will allow, and encourage developers to go beyond this in order to future proof homes and buildings.
- It will act to improve social housing energy efficiency through direct action and take full advantage of Government and energy provider funding to improve the energy efficiency of private homes.
- Engage with all sectors of our residents, communities and businesses to publicise the climate emergency declaration and work together to reduce the possible impact.

2.44 This climate emergency has placed an even greater emphasis on the Plan delivering growth in a sustainable way.

Changes to the current planning system (Government Consultation, August 2020)

2.45 The Ministry of Housing, Communities and Local Government recently completed a public consultation on changes to the current planning system[53]. With this, four key changes are proposed:

- Changes to the standard method for assessing local housing need;
- Securing of First Homes through developer contributions in the short term until the transition to a new system;
- Supporting small and medium-sized builders by temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing; and
- Extending the current Permission in Principle to major development.

[53] Changes to the current planning system, MHCLG, consultation available to view online at: https://www.gov.uk/government/consultations/changes-to-the-current-planning-system

2.46 Depending on the outcomes of this nationwide consultation, there will likely be implications that the new Local Plan will need to take account of prior to it being finalised. Namely, these are as follows:

- The new Local Plan will need to have regard to the revised standard method for calculating housing need, including any transitionary arrangements that may be in place.
- The new Local Plan will need to have regard to any implications of extending the current Permission in Principle to major developments, particularly where it could result in more or less windfall development.

2.47 These matters will be reviewed in further detail for the publication stage (Regulation 19) of the Local Plan, where some of these proposals are likely to be further advanced or implemented.

Planning for the Future (Government Consultation, August 2020)

2.48 In addition to the above, a second nationwide consultation has recently been undertaken by Ministry of Housing, Communities and Local Government. The proposals seek wide reaching reforms to the planning system, including significant changes to the way that Local Plans are prepared and structured.

2.49 For plan-making, proposals include harnessing new digital technologies and putting a greater emphasis on achieving quality design from the outset. A key output is to simplify the process, including a shift towards a more 'zonal' approach where it is clear what type of development is acceptable on any given piece of land.

2.50 There are currently no outcomes from this consultation, however the new Local Plan will be mindful of any changes that do come as a result of this consultation, including the prevailing nature of proposals, before it is finalised. As with the first consultation, it will be looked at in further detail when the Local Plan has reached its publication stage (Regulation 19).

3. Methodology and Evidence Base

3.1 The selection of sites for allocation in the Local Plan is complex and underpinned by a wide range of evidence studies which has informed officers' recommendations on draft site allocations. The process takes account of feedback received through the Issues and Options Consultation, with the Council's response to key issues raised presented in Section 5 of this topic paper.

3.2 This section is intended to summarise the site selection methodology, and the various evidence base studies that have informed the final recommendation of sites to be allocated.

3.3 The site selection methodology closely aligns itself with that set out in the PPG[54] covering the initial stages of evidence preparation, and expands upon the subsequent steps that the Council has taken to inform the final allocation of sites in the Local Plan.

3.4 The methodology consists of six key stages. The first five stages align with the PPG, and result in a comprehensive assessment of land availability across the borough. The outputs of these stages consist of three important evidence base documents:

- The Urban Capacity Study (including windfall assessment);
- The AECOM Site Assessment Study[55] and
- The Site Assessment Study Addendum

3.5 All of these studies are published alongside the draft Local Plan and demonstrate that there is sufficient land available to meet future housing needs up to 2038. The Urban Capacity Study includes a comprehensive assessment of windfall sites which forms the basis for considering an appropriate allowance in the new Local Plan.

3.6 The sixth stage draws upon the outputs of these studies and identifies a sufficient 'shortlist' of sites that require more detailed testing to determine their potential to meet the development strategy of the new Local Plan. The level of testing is more rigorous for greenfield sites (those sites outside of the urban areas, including land in the Green Belt and the Chilterns AONB), than with sites in urban areas where these predominantly consist of brownfield/previously developed land.

3.7 The diagram on the next page is intended to summarise the methodology process to date, what evidence has been prepared at each stage, and how it has informed the officer recommendations set out later in this topic paper. A summary is provided of each of the evidence base documents listed, including key outcomes where relevant.

[54] See section 2 of this topic paper.
[55] Both documents are available to view as part of the evidence base supporting the Local Plan 2036.

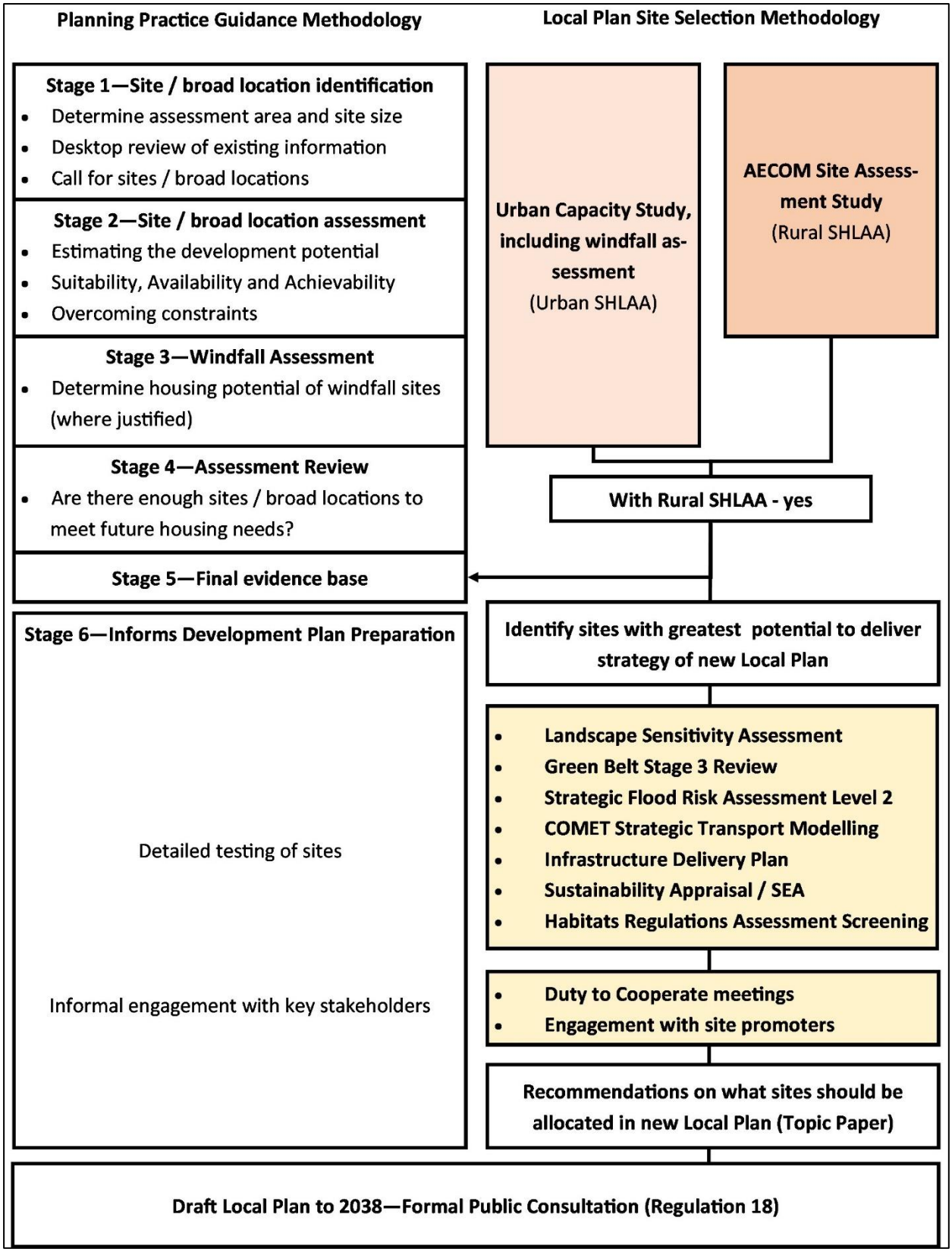


Figure 4 - Site selection methodology for the new Local Plan

Stages 1-3: Assessment of Land Availability

3.8 Before any assessment work commenced, the Council considered it appropriate to separate the assessment of urban land from rural land for the following reasons[56]:

- The Urban Capacity Study seeks to maximise the development potential of urban areas which are inset to the Green Belt. It includes consideration of a wide range of sites, including sites not specifically promoted to the Council. This is consistent with paragraph 138 of the NPPF which seeks authorities to channel development towards urban areas inside the Green Belt boundary, including towns and villages that are inset to the Green Belt.
- The AECOM Site Assessment Study gives more detailed consideration to elements such as Green Belt and landscape character. These have more specific implications for the developable site area, design, layout and form, and therefore density. Sites in the Urban Capacity Study are less sensitive to these elements and most predominantly comprise of brownfield land.
- The Urban Capacity Study gives detailed consideration of significantly higher densities than the AECOM Site Assessment Study, as sites in the built up areas of the six main settlements are likely to be closer to town/local centres and other locations that are well served by public transport[57].
- The Urban Capacity Study includes a detailed section on windfall sites and an assessment to inform a future windfall allowance for the borough. Evidence has shown that the vast majority of the existing windfall sites are located within the built-up are of the six main settlements and form part of the important exercise of channelling development towards these locations.
- The Urban Capacity Study considers those sites that might normally be discounted based on size, rather than plausible capacity. This is again in accordance with paragraph 138 of the NPPF.
- Undertaking two separate SHLAA's allows for a clearer understanding of the contribution from urban and rural locations, especially given the NPPF's emphasis on optimising development from the former.

Urban Capacity Study (including windfall assessment)

3.9 The Council's approach to site selection begins with a thorough understanding of the potential land availability in the built-up area of the six main settlements in the Borough. This is generally defined as land that is inset to the Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB).

3.10 The study assesses a wide range of sites, including completions, known commitments, promoted sites and those not promoted where the Council considers they should form part of the assessment. The study also reviews all existing allocations, and explores opportunities for making the most efficient use of these where they have not yet come forward for development.

[56] These reasons are also set out in the Urban Capacity Study
[57] National Planning Policy Framework, 2019, MHCLG. Chapter 11

3.11 The study supports a review of historic windfall delivery over the past 14 years, having regard to the updated definition of "windfall" in the NPPF[58]. The information available is extensive, covering a diverse range of development types and sizes, including small and large scale developments, conversions, garden land developments and permitted development.

3.12 The study uses the same data to gain a detailed understand of acceptable densities (gross) across urban areas. With this, the study applies proportionate assumptions on what sites could deliver in terms of higher (and in some cases, significantly higher) densities, having regard to their particular location and proximity to town centre, key employment sites and sustainable transport hubs.

3.13 A key output of the study is a robust urban capacity for the whole of the borough, broken down by each of the six main settlements. This capacity takes account of the predicted windfall allowance in a manner which eliminates any potential for double counting to occur.

3.14 The achievability of sites is determined through a high-level viability assessment using a range of typologies and locations to determine if sites could viably be delivered in the plan period. The detail set out in the viability assessment is considered proportionate to the assessment and does not consider in detail the policy requirements of the new Local Plan, which will be subject to a separate, more detailed viability assessment in due course.

3.15 The study concludes that there is an estimated urban capacity of just over 10,400 dwellings, including an allowance for windfall sites. When this is taken alongside known commitments and a windfall allowance for the rural area, the total existing capacity for the borough is closer to 11,000 dwellings.

3.16 The urban capacity figure is made up of a number of existing allocations recommended to be retained for the new Local Plan, potential new urban allocations, known commitments, and a windfall allowance. These are considered in further detail in stages 4-5 below.

AECOM Site Assessment Study

3.17 This study considers all sites promoted to the Council outside of the six main settlements. The majority of sites are located within the Green Belt and/or Chilterns AONB, with many situated on the edge of existing settlements.

3.18 The assessment considers 144 sites provided by the Council, all of which were previously promoted for development. Prior to assessment, 27 sites were filtered out due to overlapping boundaries, the site area was below 0.3 hectares, had planning permission, and/or were provided in error and formed part of the urban area of a settlement (i.e. considered through the Urban Capacity Study).

[58] National Planning Policy Framework, 2019, MHCLG. Annex 2: Glossary

3.19 Phase 1 of the assessment resulted in 38 sites being considered unsuitable on the basis that they were wholly within the AONB, or were isolated parcels in the open countryside and would be of a scale that would not result in sustainable development.

3.20 A total of 79 sites were subject to Phase 2 – a wider, more detailed assessment covering the following criteria:

- Transport and accessibility
- Green Belt;
- Geo-environmental;
- Agricultural land quality;
- Land uses – both existing and neighbouring;
- Potential for mix of housing types;
- Heritage;
- Local landscape and visual impact;
- Regeneration potential;
- Economic potential;
- Environmental impact; and
- Spatial opportunities and constraints

3.21 The assessment was supported by its own high level viability study prepared by HDH and concluded that greenfield sites are most likely to be deliverable and have capacity to bear developer contributions over and above current rates (i.e. Community Infrastructure Levy).

3.22 The outcomes of this assessment concluded that 33 sites were considered not suitable for allocation. 46 sites were considered potentially suitable, albeit all of these sites were identified as having some degree of constraints associated with them. It concluded that for all those sites that were considered suitable, there was a theoretical capacity to deliver approximately 15,000 new dwellings on these sites.

Site Assessment Study Addendum

3.23 An addendum to the AECOM Site Assessment Study was prepared to take account of a number of additional sites not considered by the original study. Some of these were accidentally omitted, while others were promoted after significant progress had been made with the original study. To ensure consistency, sites included in the addendum have followed the same methodology as that used by AECOM.

Stages 4 and 5: Assessment Review and Final Evidence Base

3.24 This stage considers the outputs of the two studies above against future housing needs, including what 'suitable' sites have potential to meet the strategy of the new Local Plan.

3.25 The revised standard method for calculating housing need (subject to public consultation in August 2020) determined that for the Local Plan period to 2038, there is an annual housing requirement of 922 dwellings per annum, or a total requirement of 16,596 dwellings.

Review of the Urban Capacity Study against future requirements

3.26 The Urban Capacity Study identifies an overall existing capacity for the borough of around 11,000 dwellings with existing and proposed new allocations subject to further testing. When compared against the overall draft plan requirement of 16,596, there is a shortfall of land to deliver around 5,600 dwellings will need to be delivered elsewhere.

3.27 In accordance with the PPG, the Urban Capacity Study has been revisited to ensure that all plausible opportunities for development have been explored. This has included a more positive approach to overcoming constraints that may otherwise render a site unsuitable in principle. It also considers whether sites could more appropriately come forward as a planning application (i.e. contribute towards a windfall allowance), reducing potential delays associated with the plan-making process.

3.28 Densities have been reviewed and different approaches considered to ensure these are optimising the use of urban land while still remaining realistic in terms of actual development potential. Over 60% of all sites assessed in detail have a gross density of 100 dwellings per hectare (dph) or more. 15% of sites are attributed the highest gross density of 250 dwellings per hectare.

3.29 In addition to this, some of the recommended site allocations (subject to further testing) have densities in excess of this. For example, a gross density of 818 dph is proposed at Symbio Place, Whiteleaf Road, and 450 dpa is proposed for the NCP car park on Hillfield Road.

3.30 The Council is confident that outputs of the urban capacity are realistic and deliverable, and that the development potential of the six main settlements is optimised in accordance with national policy and guidance. The total existing capacity for the borough is expected to deliver just over 60% of the emerging housing requirement, and equates to around 610 dwellings per annum, approximately a 20% uplift on average annual delivery rates.

3.31 The Council considers it unlikely that any further reviews of the Urban Capacity Study will likely result in the significantly higher capacity for the borough that is both realistic and deliverable. It is therefore expected that land outside of urban areas will be required to meet the deficit.

Review of AECOM Site Assessment Study and Addendum against future requirements

3.32 When the outcomes of the Urban Capacity Study and the AECOM Site Assessment Study are combined, there is a theoretical capacity, subject to further testing, to deliver approximately 26,000 dwellings. Further potential capacity has been identified through the addendum to the Site Assessment Study. When considered against the total housing requirement of 16,596 dwellings, it demonstrates that there should be sufficient land capable to meet the borough's needs in full.

3.33 It is important to reaffirm that this is a theoretical capacity based on high-level evidence prepared in accordance with the PPG. The outputs up to this point only seek to determine if there is likely to be sufficient land/sites to meet future housing needs. How this evidence informs the plan-making process, is a separate matter and set out in more detail in Stage 6 below.

3.34 Stage 6 includes the identification of sites with the greatest potential to meet the strategy of the new Local Plan and subjecting these to more rigorous testing through additional evidence and engagement with infrastructure providers and other key stakeholders.

Stage 6: Development Plan Preparation

3.35 The Urban Capacity Study represent the starting point for understanding the likely capacity of the six main settlements in the borough. As set out in previous stages, there is an expectation that land outside of the urban areas is required to meet the housing needs for the borough in full.

3.36 As a result, there is very limited potential in considering varying strategies for the main settlements in the borough. Paragraph 137 of the NPPF sets a clear but narrowly defined set of parameters that Local Plan strategies need to address before considering land outside of the urban areas (i.e. in the Green Belt, as is the case with Dacorum). Such strategies need to:

a) make as much use as possible of suitable brownfield land and underutilised land;
b) optimise the density of development in line with the policies in chapter 11 of the NPPF, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport and
c) be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

3.37 A number of important outcomes of the study are considered in turn below.

Consideration of Urban Capacity for the borough

Review of existing allocations

3.38 The Urban Capacity Study included a review of existing allocations where these are expected to deliver some housing. The review looked at the Local Allocations ("LA"s), Housing allocations ("H"s) and Mixed-Use allocations ("MU"s) to determine:

- The status of each site, including if they have already been completed;
- If they are still considered to be deliverable/developable in the plan period;
- Any opportunities to make more efficient use of allocated land, having particular regard to Chapter 11 of the NPPF.

3.39 The review determines that many of the existing allocated sites can be carried forward into the new Local Plan. The following table lists these, and also recognises where opportunities are available to increase the allocation numbers on some of these site:

Table 1 - Review of Existing Allocations

Existing Allocation:	Previous allocation:	Recommended allocation:
LA1 – Marchmont Farm, Hemel Hempstead	350	385*
LA2 – Old Town, Hemel Hempstead	80	90*

Existing Allocation:	Previous allocation:	Recommended allocation:
LA3 – West Hemel	900	1,150*
LA4 – Land at Shootersway (Hanburys), Berkhamsted	40	40
LA5 – Icknield Way, Tring	200	50*
LA6 – Chesham Road/Molyneaux Avenue, Bovingdon	60	40
H/2 – National Grid Land, Hemel Hempstead	350	400*
H/4 – Ebberns Road, Hemel Hempstead	30	30*
H/7 – Land at Turners Hill, Hemel Hempstead	43	60*
H/8 – 233 London Road, Hemel Hempstead	10	10
H/11 – Land rear of St Margaret's Way / Datchworth Turn	32	50*
H/13 – Frogmore Road	150	170*
H/15 – Miswell Lane	24	24
H/18 – Land adjacent to Coniston Road	12	10
H/19 – Corner of Hicks Road / High Street	15	13
H/20 – Watling Street (rear of Hicks Road/High Street)	10	20*
MU/1 - West Herts College site and Civic Zone, Queensway	600	200*
MU/2 - Hemel Hempstead Hospital Site, Hillfield Road	400	450*
MU/3 - Paradise/ Wood Lane	75	350*
MU/4 - Hemel Hempstead Station Gateway, London Road	200	350*
MU/7 – Gossoms End / Billet Lane	30	30
MU/9 - Berkhamsted Civic Centre and land to rear of High Street	16	16
Grovehill Neighbourhood Plan		200[#]
Total		**4,138**

* denotes sites where a higher density is proposed, having regard to the existing allocation size and number.

[#] denotes a notional figure for the allocated site in the adopted Grovehill Neighbourhood Plan which did not prescribe a specific number of new dwellings.

3.40 The review of existing allocations has demonstrated the potential to contribute just over 4,100 dwellings towards the total housing requirement of the plan period. Of the 23 sites recommended to be carried forward, 14 sites are recommended to deliver higher densities relative to their existing allocation size and number. These sites were carried forward for detailed testing including through the Sustainability Appraisal.

Review of other urban sites with greatest potential for allocation in the new Local Plan

3.41 The development strategy for the borough is supportive of redevelopment opportunities in urban areas where these accord with the policies of the Local Plan.

3.42 The Council considers Chapter 11 of the NPPF (Making efficient use of land) is an important consideration when determining the number of additional urban allocations. In addition to the need to review existing allocations where there are issues with delivery (paragraph 120), paragraph 121 of the NPPF sets out that authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans.

3.43 In particular, authorities should support proposals (at the application stage) to use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres.

3.44 With this, the Council believes that there is a case to focus new allocations on key opportunity sites where the development potential can only realistically be maximised through the plan-making process. An alternative option could be to allocate more urban sites in the Local Plan, however the positive approach underpinned by Paragraphs 120 and 121 of the NPPF mean that many sites in urban areas could be considered through the development management process, and contribute towards a future windfall allowance. This is consistent with the approach taken in the Urban Capacity Study.

3.45 Historically, the majority of land promoted through a call for sites/plan making process has been on sites outside of urban areas. Most urban sites currently promoted for development are being predominantly progressed through the development management process rather than the plan making process.

3.46 Appendix D of the Urban Capacity Study makes recommendations on those sites identified as suitable for further consideration and which have the greatest potential for allocation in the new Local Plan. These sites are carried forward for further detailed testing including through the Sustainability Appraisal.

Table 2 - Recommended new urban allocations

Site	Recommended allocation
Market Square / Bus Station, Marlowes, Hemel Hemsptead	Around 130 dwellings; and Other uses at ground floor level.
NCP Car Park, Hillfield Road, Hemel Hempstead	Around 100 dwellings; and Other uses at ground floor level.
Two Waters North Hemel Hempstead	Around 350 dwellings.
Two Waters East, Two Waters Road, Hemel Hempstead	Around 60 dwellings.
Symbio Site, Whiteleaf Road, Hemel Hempstead	Around 180 dwellings.
Kier Park (Plots 2/3), Maylands Avenue, Hemel Hempstead	Around 250 dwellings; and Around 1,400 sq.m of office floorspace.
66 and 72 Wood Lane End, Hemel Hempstead	Around 150 dwellings.

Cupid Green Depot, Hemel Hempstead	Around 360 dwellings.
South of Green Lane, Hemel Hempstead	Around 80 dwellings.
Sarthe Business Park, Billet Lane (Jewson Site), Berkhamsted	Around 40 dwellings.
Total	**Around 1,700 dwellings**

3.47 When the figure of 1,700 dwellings is combined with the total for existing allocations, this gives a total supply (subject to detailed testing) of 5,838 dwellings.

Existing commitments

3.48 Existing commitments also form an important source of housing supply. The following table presents the known commitments as of 01/04/2020 (i.e. the start of the Local Plan period). The table excludes any figures relating to existing and potential new allocations listed above, to ensure that double counting does not occur.

Table 3 - Summary of existing commitments

Year	Dwellings
Known commitments as at 01/04/2020	**2,708**
Of which:	
• Hemel Hempstead	1,873
• Berkhamsted	143
• Tring	313
• Kings Langley	71
• Bovingdon	27
• Markyate	8
• Rest of borough	273

3.49 The data above demonstrates that just over 2,700 additional homes are known commitments, the majority of which are expected to come forward early in the plan period. When this figure is added to the existing allocations and recommended new urban allocations, this gives an updated housing supply of 8,546 dwellings.

Determining a windfall allowance

3.50 The Urban Capacity Study demonstrates that a substantial amount of development comes forward speculatively through the development management process in the borough, on land not identified or allocated in existing development plan documents.

3.51 The detailed analysis on windfall sites in the Urban Capacity Study is not repeated here, however some of the key findings are summarised as follows:

- Since 2006, 90% of housing delivered on windfall sites come forward in the urban areas of the six main settlements across the borough;
- Since 2006, the average annual windfall delivery rate is 306 dwellings per annum, representing 67% of total housing completions in that time. This justifies the importance of windfall sites in Dacorum and the need to apply a windfall allowance to future housing supply;
- In the last three years, the average annual windfall delivery rate increase to 322 dwellings per annum on average, and represent almost 60% of total completions;
- Garden land developments are broadly in decline, replaced over the years with more redevelopment of brownfield land;
- The 2008 economic downturn resulted in a decrease in the delivery of windfall sites. On developments of less than 10 dwellings, the effects were relatively short-lived and compensated with 'bounce-back' periods. For large sites (10+ dwellings) short term impacts were also offset with a 'bounce-back' period. More prolonged impacts on housing delivery were experienced 3-5 years after the downturn. Evidence suggests a significantly downturn in planning activity during the height of the downturn resulted in the lack of delivery in the period that followed.
- The effects of the current COVID-19 pandemic are likely to have an impact on annual delivery rates, however there is insufficient evidence to justify the scale of the impact at this time.
- There is insufficient evidence to justify a windfall allowance for sites that come forward through the prior approval system. There have been a number of important changes to the system at the local and national level (such as new article 4 directions and changes in permitted rights) and it is unclear what impacts these will have on likely future delivery rates. Any future delivery on these sites will add resilience to the recommended windfall allowance figure set out below.

3.52 The review of windfall sites makes the following recommendations on likely delivery rates which are considered to be robust and appropriate for the purpose of plan making and predicting likely infrastructure requirements. A stepped approach to implementing a windfall allowance is recommended, having regard to different scales of development, the time it takes for such sites to come forward, and the projected delivery of known commitments.

Table 4 - Recommendations on a future windfall allowance

Type of windfall site	**Annual allowance**
Small sites (<5 dwellings) Can be applied from year 4 of the most recent supply position	75
Medium sites (5-9 dwellings) Can be applied from year 5 of the most recent supply position	25
Large sites (10+ dwellings)	Up to 100

Can be applied from year 6 of the most recent supply position. A reduced allowance should be made where known commitments exist in the medium term, to minimise the risk of double counting during this period.	
Maximum annual windfall allowance	**Up to 200**

3.53 When these recommendations are applied to the most recent housing trajectory (from 01/04/2020), the following table explains how the windfall allowance is applied incrementally alongside known commitments. This ensures no double-counting exists between committed windfall sites and the future allowance.

Table 5 - Application of windfall recommendations to housing supply

Year	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030+
Commitments	654	946	379	368	99	67	85	64	64	12	0
Small				0	75	75	75	75	75	75	75
Medium					25	25	25	25	25	25	25
Large						33	15	36	36	88	100
Supply	**654**	**946**	**379**	**368**	**199**	**200**	**200**	**200**	**200**	**200**	**200**
Total Windfall	**0**	**0**	**0**	**0**	**100**	**133**	**115**	**136**	**136**	**188**	**200**

3.54 Applying this approach across the plan period up to 2038, the recommended windfall allowance for the new Local Plan is calculated to be 2,408 dwellings.

3.55 The Urban Capacity Study also confirms that there is a theoretical capacity of land capable of delivering this windfall allowance.

Conclusions on urban capacity and existing capacity in the rest of the borough

3.56 It can be concluded from the information set out above that **10,954 dwellings** can be expected to deliver in Dacorum through a combination of existing allocations, new urban allocations, known commitments and through a windfall allowance. The following table summarises this:

Table 6 - Summary of existing capacity in Dacorum

Source of housing supply	Dev. potential
Existing allocations (following review)	4,138
New allocations in urban areas	1,700
Commitments (from 01/04/2020)	2,708
Windfall allowance (Up to 200 over 12 years)	2,408
Total existing capacity (including windfall allowance)	**10,954***

* 514 dwellings are to be delivered outside of the main urban areas through known commitments and windfall sites.

Comparison against the total housing requirement of the new Local Plan

3.57 The total urban capacity of Dacorum makes an important contribution towards future housing supply, but cannot meet the overall housing requirement of the new Local Plan in full. In order to meet the minimum plan requirement of 16,596

dwellings, **additional land is needed to be identified to deliver the remaining requirement of 5,642 dwellings**.

3.58 Given the positive approach taken to maximise the development potential of sites in urban areas, including maximising densities in highly sustainable locations such as town centres and close to public transport hubs, it is not possible to meet future housing requirements within the built-up area of the six main settlements of Dacorum.

3.59 The plan therefore needs to consider if there is sufficient land that is suitable, available and achievable outside of these settlements that are capable of meeting the development strategy of the new Local Plan.

Green Belt and the consideration of all other reasonable options.

3.60 The London metropolitan Green Belt plays an important role in preventing the urban sprawl of the six main settlements in the borough. Five of the six main settlements are inset to the Green Belt. The exception is Markyate, where the Green Belt defines the southern, eastern and north-eastern boundaries of the village.

3.61 Equally the Chilterns AONB, which is afforded the highest level of protection due to its enhanced landscape and scenic beauty[59], is an important factor in considering growth on the edge of the three market towns and the village of Markyate.

3.62 The only area that is not constrained by the Green Belt and Chilterns AONB is located in the north-western corner of the borough. This broad area is predominantly rural in character and includes the smaller villages of Long Marston and Wilstone. Wider influences in this area include the settlements of Aylesbury and Aston Clinton to the west, with Wingrave, Cheddington and Marsworth to the north (all located in Buckinghamshire).

3.63 On the matter of Green Belt, paragraph 137 of the NPPF makes clear that "*before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development*". These are considered in turn below:

1. Does the strategy make as much use as possible of suitable brownfield sites and underutilised land?

3.64 As demonstrated above, the strategy for development in the six main settlements seeks to maximise the delivery of previously developed and underutilised land. The strategy follows a review of existing allocations, including those on brownfield land, as well as allocate new brownfield sites where these are considered to make a significant contribution towards future housing delivery.

[59] NPPF, paragraph 172

3.65 The strategy is also underpinned by a positive but realistic windfall allowance which will deliver in excess of 2,400 homes. Historic and likely future trends confirm that the majority of the windfall developments are expected to come forward on brownfield and underutilised land, having regard to historic and likely future trends, as well as other evidence presented in the Urban Capacity Study.

2. Does the strategy optimise the density of development, including whether policies promote a significant uplift in minimum density standards in town centres and other locations well served by public transport.

3.66 The strategy considers a number of opportunity sites in Hemel Hempstead town centre, the Two Waters/Apsley area and close to key areas of employment such as Maylands Business Park, which are all well served by public transport. Existing allocations were reviewed and over 60% of those recommended to be retained have had their densities increased when compared to existing allocation numbers.

3.67 New sites recommended for allocation in the Urban Capacity Study are expected to deliver some of the highest density schemes in the plan period. Seven of the nine new urban allocations in Hemel Hempstead will deliver (gross) densities in the region of 100dph or above. Half of these are in excess of 200dph with the site at Symbio Place expected to deliver in excess of 800dph.

3.68 The town centres of Berkhamsted and Tring are more constrained due to their historic character and designated conservation areas. As a result, there are less opportunities from available sites to deliver significantly higher densities.

3. Has the strategy been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?

3.69 The strategy takes account of discussions with neighbouring authorities, and in particular with those that make up the South West Herts Authorities, to which the housing market area broadly corresponds with. These discussions continue to progress, however it is clear at this stage that each of these authorities are experiencing similar housing pressures which would likely necessitate the release of Green Belt land to meet their own needs through their respective Local Plans.

3.70 Buckinghamshire Council lies to the west and south of Dacorum. In 2020, it became a unitary authority from the areas previously administered by Buckinghamshire County Council and the districts of South Bucks, Chiltern, Wycombe and Aylesbury Vale. Located in a separate housing market area to Dacorum, three of these districts are significantly constrained by the Green Belt in a similar manner to Dacorum, with the emerging Local Plans for these areas proposing releases to the Green Belt in order to meet their own needs.

3.71 Aylesbury Vale is the neighbouring district least constrained by the Green Belt, although some Green Belt land exists along the shared boundary with Dacorum.

The emerging Aylesbury Vale Local Plan includes proposals for significant growth at Aylesbury (Garden Town) including allocations that extend eastwards to the boundary with Dacorum. The Vale of Aylesbury Local Plan is at an advanced stage of preparation, and is expected to be adopted in 2021.

3.72 This cross-boundary matter will be addressed in due course through a number Statements of Common Ground prepared in accordance with the duty to cooperate and national policy. Further information will also be set out in a Statement of Compliance with the Duty-to-Cooperate that will accompany the submission version of the Local Plan.

4. Are there any other reasonable options for meeting its identified need for development before considering land in the Green Belt?

3.73 As mentioned earlier, there is land in the borough that is outside of the six main settlements which is not designated Green Belt land. The majority of this land is designated Chilterns AONB, and generally located on rural land to the north of Hemel Hempstead, Berkhamsted and Tring. This land forms the backbone of the Chiltern Hills and is intrinsic to the special characteristics of the AONB designation. It also includes The Chiltern Beechwoods SAC (Ashridge Estate) which is sensitive to air quality and recreational pressures.

3.74 The Council considers that the remaining 5,642 dwellings cannot reasonably be located either in whole or in part in the Chilterns AONB as there is insufficient land available for development and any substantial allocations would be contrary to national policy, namely that it would not conserve or enhance this national important designation (Paragraph 172 of the NPPF).

3.75 The only land not designated as Green Belt or AONB is that located to the north west of Tring, and includes the smaller settlements of Wilstone and Long Marston.

3.76 Five small parcels of land have been promoted for development in this broad location, with an estimated development potential of just 128 dwellings[60]. This is significantly short of the 5,642 dwellings requiring land to be identified. The Council considers that the allocation of these sites in more remote locations would give rise to less sustainable patters of development, placing an increased pressure on existing services and facilities while limited or no potential to deliver enhancements.

3.77 A final option would be to consider a new settlement in this broad location. To date, the Council has not received any evidence to suggest such an option is either deliverable or developable (no reasonable prospect of coming forward) in the plan period, or that it could make a significant contribution towards housing supply given the significant lead-in time required for new settlements.

[60] One site (1.8ha) was considered by AECOM to be unsuitable as it was located in the open countryside and not related to any nearby settlement. It therefore had no development potential.

3.78 Despite the unlikely situation that significant land in this broad location will be promoted for development, the Council considers it reasonable in the context of national policy to identify land in this broad location and subject it to further testing, to ensure it is appropriately considered as an option for delivering future growth. Over 200 hectares of land has been identified close to the settlement of Long Marston for this purpose.

Consideration of sites outside of the urban areas, including land in the Green Belt

3.79 The AECOM Site Assessment Study is the starting point for the assessment of sites outside of the built-up area of the six main settlements. It identifies 46 sites as suitable for further consideration and with the potential for allocation in the new Local Plan[61].

3.80 The subsequent addendum considers a further 12 sites, ten of which were promoted to the council. It also includes an assessment of the land in the north west of the borough, close to Long Marston village, as set out in paragraph 3.78 above.

3.81 The addendum also includes an assessment of Bovingdon Airfield as a potential new settlement option. In coming to this view the Council has given regard to the requirements of national policy and the sequential approach to considering land for release from the Green Belt. Paragraph 138 of the NPPF makes clear that when changes are likely to be made to the Green Belt, "*plans should give first consideration to land which has been previously-developed and/or is well served by public transport*".

3.82 Given the predominantly brownfield nature of Bovingdon Airfield and the significant scale of the site, officers consider it reasonable to identify the site for assessment to ensure this particularly part of national policy is appropriately assessed.

3.83 Of the 46 sites from the AECOM Site Assessment Study and five from the addendum considered to be potentially suitable, the Council has carried forward 37 sites for detailed testing, having regard to the emerging development strategy of the Local Plan. This, exceptionally includes one site that AECOM considered to be unsuitable.

3.84 Site 16 - "Rossway Farm, Land between Shootersway and A41 bypass" is located immediately adjacent to other sites at Berkhamsted considered in the same assessment to be suitable. The Council believe that the testing of this site would allow for a more holistic approach to considering options for growth (including reasonable alternatives) in Berkhamsted.

3.85 The Council's justification for not subjecting the remaining "suitable" sites to detailed testing is set out in the following table:

[61] The study also identified one site as being suitable for consideration as an employment allocation at Bourne End.

Table 7 - Reason for excluding sites from detailed testing

Justification	Site
Sites are less than 1 hectare in size. There is sufficient evidence to demonstrate that there is a healthy supply of smaller sites coming forward, predominantly in urban areas and are capable of meeting 10% of the housing requirement. This also reduces the case for exceptional circumstances to exist to justify changes to the Green Belt in these locations.	**13** – Land at Bank Mill Lane (adj. to Heron Place), Berkhamsted **83** – Camelot Rugby Club, Hemel Hempstead **86** – 16-18 and 22 Rucklers Lane, Kings Langley **130** – South of Park Road / West of East Lodge, Tring **153L** – Land at Coniston Road (adj. to allocation), Kings Langley
Sites are at a higher risk of flooding and it is considered that there are other sites which are sequentially more suitable for development, having regard to their own particular characteristics, including sustainability merits.	**66** – Land Adjacent to the Red Lion Public House, Hemel Hempstead **92** – Land at Grand Union Canal, Kings Langley
Development of sites would erode an important open gap separating Hemel Hempstead with Piccotts End and Nash Mills respectively. Due to the scale and nature of these sites, there is limited potential to adequately mitigate this.	**73** – Marchmont Farm, Hemel Hempstead **154L** – Shaffords Knoll Farm, Kings Langley
Site consists of some previously development land in the smaller village of Great Gaddesden (within the AONB), which has limited services and facilities. The garden centre is now under new management and there is a reasonable prospect that the site can be retained for its current use.	**61** – Wyevale Garden Centre, Great Gaddesden
Development of sites in the smaller villages would likely result in less sustainable forms of development, where existing community services and facilities are already limited. Such locations are distant from public transport corridors and would place a greater emphasis on the use the private motor car. Prior to sites being discounted from further consideration, they were reviewed (as stand-alone sites or in	**101** – Land west of Long Marston **139** – Grange Farm, Wilstone **140** – Lock Field, Tring Road, Wilstone **141** – Tring Road, Wilstone

Justification	Site
combination with neighbouring sites) for their potential to deliver new services and facilities for the local area, however it was concluded that there was limited sustainability benefits to be gained from these sites. The strategy does allow for limited infilling in the smaller settlements, ensuring growth is proportionate to the scale of the settlement.	
Access. It is unclear at this stage how safe site access could be provided to this site in order to accommodate a major residential development.	**151L** – Chaulden Lane, Hemel Hempstead

3.86 The removal of the sites above do not significantly impact the amount of land being carried forward for detailed testing. As demonstrated in the table below, the majority of the potential capacity identified by AECOM (c.98%) is subject to detailed testing, including through the Sustainability Appraisal.

Table 8 - Comparison of AECOM conclusions with sites tested in detail

	AECOM – Total land potentially suitable for allocation (dwellings)	DBC – AECOM land identified for detailed testing (dwellings)
Hemel Hempstead	7,472	7,385 (98.8%)
Berkhamsted	2,871	2,863 (99.7%)
Tring	2,787	2,777 (99.6%)
Bovingdon	510	510 (100%)
Kings Langley	1,246	1,192 (95.6%)
Markyate	170	170 (100%)
Great Gaddedsden	21	0 (0%)
Long Marston	12	0 (0%)
Wilstone	103	0 (0%)
TOTAL	**15,192**	**14,897 (98%)**

3.87 The inclusion of the additional sites for detailed testing at Bovingdon Airfield and on land near to Long Marston means that the total amount of land subject to detailed testing is in excess of the land identified by AECOM as potentially suitable.

Detailed Testing and informal engagement with stakeholders

3.88 The sites identified as having potential for allocation in the new Local Plan were subject to a more detailed testing process. This proportionate evidence is

available to inform final officer recommendations. The outcomes relating to this evidence is extensive and not repeated here, however a summary of likely constraints and opportunities is presented for each site in Appendix B of this topic paper. A short overview of key evidence base studies relevant to the site selection process is presented below.

Strategic Flood Risk Assessment Level 2 (GBA Consulting, 2020)

3.89 The SFRA Level 2 uses the most up-to-date information to present flood risk from all sources of flooding for each site tested in detail. In addition to green belt sites, the SFRA Level 2 assesses sites in urban areas, and is used to inform the sequential and exception test.

Landscape Assessment (ARUP, 2020)

3.90 This study provides an additional level of detail to the earlier landscape appraisal to that prepared in 2015. It considers the susceptibility of specific sites to change in landscape terms, and also adds better definition to the sensitivities associated with each site, including particular considerations that each site would need to respond to, should they be carried forward as allocations in the new Local Plan.

3.91 Landscape susceptibility is the degree to which a defined landscape and its associated visual qualities and attributes might respond to the specific development type / development scenario or other change without undue negative effects on landscape character and visual resource.

3.92 Landscape sensitivity may be regarded as a measure of the resilience, or robustness, of a landscape to withstand specified change arising from development types or land management practices, without undue negative effects on the landscape and visual baseline and their value.

3.93 The landscape sensitivity of the characteristics and qualities of each site to change arising from potential residential development is assessed, taking into account the judgements on value and susceptibility. Sensitivity is assessed on a five-point scale, although variations of sensitivity within the parcels are also noted in the assessment, where appropriate.

Green Belt Study Stage 3 (ARUP, 2020)

3.94 The Stage 3 review differed from the previous two stages of Green Belt evidence in that it was more site-informed. The study had three main components:

- To assess potential allocations currently situated within the Green Belt, considering the acceptability of these sites in Green Belt boundary terms and provide site specific advice on any mitigation required;
- To advise on new Green Belt boundaries around the six key settlement following consideration of these sites; and
- To assess the landscape and visual impact of the potential housing and employment sites.

3.95 The Green Belt Stage 3 does not replace the outcomes of the previous evidence on Green Belt. The stage 3 report focuses on those greenfield sites subject to detailed testing and considers the potential mitigation measures and boundary reinforcements each site would need from a Green Belt and landscape perspective. Further information on how the Green Belt has been considered is set out in the Green Belt topic paper.

Strategic Transport Modelling – COMET (AECOM, 2020)

3.96 Strategic transport modelling using Hertfordshire County Council's COMET model tests a number of scenarios for growth across the borough. COMET is the standard for planning for growth across Hertfordshire, and annual runs are completed for the whole of the county.

3.97 A number of specific model runs were undertaken for the new Local Plan, each with their own specific purpose. A technical report has been prepared which summarised the outcomes of these model runs. The report also provides useful information on predicted traffic flows specifically arising from a small number of large scale developments.

Draft Dacorum Infrastructure Delivery Plan (GMA, 2020)

3.98 The draft Dacorum Infrastructure Delivery Plan (IDP) sets out the infrastructure required to create quality places and support the delivery of the local plan level of housing and employment growth across the borough. The IDP seeks to:

- Understand the capacity (surplus and deficits) of existing infrastructure provision;
- Identify planned investment in infrastructure;
- Determine infrastructure requirements to support planned levels of growth;
- Set out the estimated costs of infrastructure, funding sources, and phasing of delivery (where known);
- Identify the scale of the gap between committed, allocated and required investment in infrastructure and the potential means by which this gap could be bridged; and
- Identify key bodies with responsibility for delivering infrastructure.

3.99 Urban and rural sites subject to detailed testing have been considered for their potential infrastructure requirements and their ability to deliver new infrastructure on site in tandem with the emerging IDP, and has involved significant engagement with infrastructure providers including in relation to education, transport, health, policing and utilities.

Habitats Regulations Assessment (emerging)

3.100 The Habitats Regulations Assessment determines if the Local Plan and its proposed levels of growth (either alone or in combination with other plans or

projects) may affect the protected features of one or more habitats site (European Sites).

3.101 The plan is screened for its potential to give rise to likely significant effects on habitats sites. Where likely significant effects may occur, and appropriate assessment should be undertaken to look objectively at these risks, whether they will give rise to such effects and if so, to identify ways in which these risks can be mitigated or reduced so that effects are no longer significant.

3.102 The Chiltern Beechwoods Special Area of Conservation (SAC) is identified as a habitats site where planned growth in Dacorum could give rise to likely significant effects as a result of recreational pressures and air quality impacts.

3.103 The plan and the sites considered for allocation are assessed for their potential impacts based on their location relative to the SAC, and what this means in terms of likely visitors to the SAC as well as an understanding of the likely increase in vehicle trips in close proximity to the SAC.

Sustainability Appraisal incorporating Strategic Environmental Assessment Interim Report (TRL, 2020)

3.104 The Sustainability Appraisal (SA), according to the PPG "is a systematic process that must be carried out during the preparation of local plans and spatial development strategies". Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."

3.105 The SA draws upon a wide range of evidence, including those listed above, and considers ways in which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

3.106 The SA of the new Local Plan has evolved over time, with a working note accompanying the Issues and Options consultation. This note included an appraisal of spatial growth options considered reasonable at the time. It was also supported by an appraisal of sites with the potential for allocation in the new Local Plan. Both of these were subject to consultation and a large number of comments were received.

3.107 This work has been refined and updated, taking account of a revised housing requirement for the borough, new evidence base studies and a number of new sites have been included where these are considered to be reasonable for the purposes of this appraisal.

Sites subject to detailed testing

3.108 The following table summarises what types of sites were subject to the different forms of detailed testing:

Table 9 - Evidence studies used to inform detailed testing of sites

Evidence	**Urban Sites** (Existing and proposed new allocations)	**Rural Sites** (35 sites identified)
Sustainability Appraisal	Yes	Yes
Habitats Regulations Assessment (emerging)	Yes	Yes
Draft Infrastructure Delivery Plan	Yes	Yes
Strategic transport modelling – COMET	Yes	Yes
Green Belt Study Stage 3	No	Yes
Landscape Assessment	No	Yes
Strategic Flood Risk Assessment Level 2	Yes	Yes

Informal engagement

3.109 The Council has sought feedback from specialist officers (include those external to Dacorum Borough Council) on a range of other important elements, including in relation to conservation, archaeology, ecology, environmental health and drainage.

3.110 This engagement has enhanced the Council's understanding of known constraints and potential opportunities associated with each site, before making a recommendation on what sites should be allocated to deliver the strategy of the new Local Plan.

Emerging spatial strategy for the new Local Plan

3.111 A core element informing the recommendation of sites in the new Local Plan is how each site plays it part in the emerging strategy for the new Local Plan. While the strategy is an important consideration from the outset of the site selection process, it is important that each site recommended for allocation plays its part in delivering it. The following elements are important to the emerging strategy and have informed the recommendation of sites to be allocated in the new Local Plan.

- Optimising the use of urban land, particularly in Hemel Hempstead where such opportunities are at their greatest.
- Building upon the existing settlement hierarchy, ensuring that growth is focussed towards the three main towns.
- Delivering modest growth at the villages of Bovingdon, Kings Langley and Markyate, allowing them to meet local needs while maintaining and enhancing existing services and facilities.
- Delivering growth in a manner that encourages sustainable movement patterns where possible.

- Directing development towards locations where new infrastructure can be provided.

Conclusions on methodology and evidence base

3.112 The methodology presented in Section 3 demonstrates the robust processes that the Council has undertaken to inform the recommendation on what sites should be allocated in the draft Local Plan. The outcomes of this process is presented in further detail in Section 7 of this Topic Paper.

3.113 Section 4 looks in more detail at how the Council has considered the key issues raised through the Issues and Options public consultation (2017) and how this has informed the methodology set out above. It also briefly summarises how the Council has engaged with a number of important organisations through the duty to cooperate as part of the process informing officer recommendations.

4. Consultation and Engagement

4.1 This section of the Topic Paper explains what consultation and engagement the Council has undertaken and the responses it has received at each stage.

Issues and Options (Reg. 18) Consultation

4.2 The Council undertook a Reg.18 consultation during November-December 2017 which has helped inform and develop the emerging Local Plan. The Council received a total of 22,708 responses to 46 questions from 2,376 individuals and organisations. The main documents can be found in the link below.[62]

4.3 The table below provides a brief summary of the key issues raised through the Issues and Options consultation and how the methodology informing site selection has been refined and updated as a result. A summary of the consultation material and the responses are available from the Council website[63].

Table 10 - Key issues raised through Issues and Options consultation

Key Issues Raised (Issues and Options – Reg.18 Consultation)	How has the Council responded
Concern that the Council has not fully assessed urban capacity and made decisions about underused spaces throughout its towns, including Hemel Hempstead.	The draft Local Plan is now supported by a comprehensive Urban Capacity Study, which includes an assessment of windfall sites. This is published as part of the evidence supporting the draft Local Plan and represents the starting point for the methodology informing site selection.
Concern around the approach to development in the Green Belt and the approach to be taken to assess future development sites. It was felt that a further assessment would be required on Green Belt sites before identifying preferred options.	The draft Local Plan is now supported by a comprehensive Site Assessment Study (and addendum) which considers in detail all sites promoted to the Council outside of the urban areas, predominantly on Green Belt land and land in the Chilterns AONB. The draft Plan is also supported by a Green Belt Study (Stage 3), Landscape Assessment, and other key studies which have informed the recommendation of allocations at this stage.
The protection of ecological assets should be given great weight and priority in the plan.	The site selection methodology gives consideration to a wide range of ecological assets ranging from the internationally

[62] http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan
[63] http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan

Key Issues Raised (Issues and Options – Reg.18 Consultation)	How has the Council responded
	important designations to the locally important sites. Such considerations are included in the Urban Capacity Study and the Site Assessment Study, and have also been informed by emerging work on the Habitats Regulations Assessment (HRA) and through informal engagement with key stakeholders. Where possible impacts may occur, the draft Plan seeks to address these through dedicated policies, including site specific policy requirements, to ensure any such impacts are minimised from the outset. The Plan is also supported by a Sustainability Appraisal Interim Report which considers likely significant effects of the proposed growth on environmental factors, including ecology, and makes recommendations on possible mitigation measures where necessary. This approach is consistent with the NPPF.
The Chilterns Area of Outstanding Natural Beauty (AONB) is an important consideration as this is a nationally recognised area afforded special protection, including protection of its setting.	The Council attaches significant weight to the importance of protecting the Chilterns AONB and its setting. The site selection methodology seeks in the first instance to avoid the allocation of sites for residential development in the AONB, and would only consider allocating sites in the AONB if there is insufficient land elsewhere to meet future needs. The Site Assessment Study concludes that all sites promoted wholly within the AONB are unsuitable for possible allocation. The Council agrees with this approach and the draft Local Plan does not allocate any sites for development within the AONB. As set out in Section 3 of this topic paper, there is sufficient capacity of land available outside of the AONB to meet the needs of the draft Local Plan. The Council has also given careful consideration to potential for new development to impact upon the setting of the Chilterns AONB. The Landscape

Key Issues Raised (Issues and Options – Reg.18 Consultation)	How has the Council responded
	Assessment identified policy requirements which sites will need to address at the application stage to ensure that any impacts on the setting are minimised.
Concerns over the extent to which infrastructure assessments have fed into the Plan. Of particular importance is the need for schools and healthcare facilities.	The draft Local Plan is supported by a draft Dacorum Infrastructure Delivery Plan, informed through engagement (including the Duty to Cooperate) with key infrastructure providers to ensure that such requirements are planned for in a timely manner. The detailed testing of sites has considered the potential for sites to deliver new infrastructure of different scales, recognising that such infrastructure would likely impact upon any site's ability to deliver housing. The potential for each greenfield site (that were tested in detail) to deliver new infrastructure is summarised in Appendix B of this topic paper. Significant new infrastructure is proposed, including new primary and secondary school provision, local centres, enhancements to health and policing, alongside new parks and enhanced green and blue corridors.
Concerns around the impact that development will have on the Chiltern Beechwoods Special Area of Conservation (SAC) from growth in Dacorum and in adjoining authorities.	The Local Plan will be supported by a Habitats Regulations Assessment (including Appropriate Assessment) in due course. Work to date on the HRA screening of the draft Local Plan has identified that there is potential for significant adverse effects to occur at the Chilterns Beechwoods SAC. These principally relate to recreational pressures and air quality, with the later mainly focussed on the section of the SAC nearest to the A41 (Tring Woods). The Appropriate Assessment of the HRA will look in more detail at these effects (and any others that may emerge) and will inform the next stage of the site selection process, following public consultation. This

Key Issues Raised (Issues and Options – Reg.18 Consultation)	How has the Council responded
	could include specific requirements for the provision of Suitable Alternative Natural Greenspace (SANG) and/or Strategic Access Management and Monitoring (SAMM) to be delivered at the three main towns in the borough.
Water availability is a major consideration and capacity is required to meet the needs arising from new development.	The Council continues to engage proactively with water and wastewater infrastructure providers. Predicted infrastructure requirements are set out in the Council's draft Dacorum Infrastructure Delivery Plan and through draft policies on infrastructure delivery in the Local Plan. Relevant infrastructure providers agree that upgrades are required to meet planned growth but there are ultimately no showstoppers to the growth set out in the draft Local Plan.
Consideration will need to be given to potential pollution (water and air quality) arising from development. It is important that the Plan safeguards human and environmental health.	The new Local Plan is supported by a Sustainability Appraisal (including SEA) which considers the likely environmental effects of the plan. Both water and air quality are considered through this appraisal, and there are specific policies within the plan that deal with these matters. The site selection process has taken account of dedicated transport modelling to understanding how proposed new allocations could impact upon designated Air Quality Management Areas (AQMAs). Further work on transport modelling/air quality will be undertaken following public consultation and will inform the final recommendations on sites to be allocated in the new Local Plan. In general, air quality is steadily improving across the borough, however two designated AQMAs continue at Two Waters/Apsley to exceed accepted levels.
It was widely acknowledged that there are acute transport issues across the borough which need to be considered as the Plan develops.	The draft Local Plan has been informed by strategic transport modelling of scenarios to better understand the likely impacts that

Key Issues Raised (Issues and Options – Reg.18 Consultation)	How has the Council responded
	planned growth will have on the local and wider transport network. The Council has frequently engaged with Highways England Hertfordshire County Council on strategic and local transport matters and further work is being prepared to inform the final recommendation on sites, following public consultation. The site selection process has equally informed the preparation of the Berkhamsted and Tring Sustainable Transport Strategy, which sets out a number of projects and interventions to minimise the use of the private car in these locations. The Local Transport Plan 4 (HCC) is embedded in new policies in the Local Plan and includes key principles such as prioritising the movement of people on foot and cycle over other forms of transport. Sustainable Transport Plans for Hemel Hempstead, Berkhamsted and Tring set out a range of projects for each of these settlements and how they meet the overarching principles of Local Transport Plan 4.

Duty to Cooperate

4.4 The Council has engaged with a wide range of stakeholders, both formally through the Issues and Options (Reg.18) consultation and meetings held since, while preparing the draft Local Plan. This has included a number of meetings with Duty to Cooperate bodies in relation to the site selection process. Wider strategic cross boundary matters, including in relation to un-met housing need are set out more comprehensively in the Duty to Cooperate Topic Paper, however the following represents a summary of the engagement that has taken place with respect to site selection.

Table 11 - Engagement with Duty to Cooperate organisations

Organisation	Type of engagement
Environment Agency	Informal engagement on sites, predominantly relating to flood risk,

Organisation	Type of engagement
	including the application of the Sequential and Exceptions Test.
Natural England	Formal (advice) and informal engagement with respect to the preparation of the Habitats Regulations Assessment and advice on other important designated sites that could be affected by proposed growth in the Borough.
Historic England	Informal engagement on matters relating to the historic environment and the potential impact of development on designated and non-designated heritage assets as a result of the proposed growth.
Highways England	Informal engagement on the impact of growth on the strategic transport network, including the M1 and M25.
Network Rail	Informal engagement on the impact of growth on the rail network.
Hertfordshire Clinical Commissioning Group	Informal engagement with respect to health provision having regard to planned growth.
Hertfordshire County Council	Informal engagement on infrastructure provision, including highways, education, health, libraries and other community facilities. Engagement also with respect to potential ecological and historical impacts of sites.
South West Herts Authorities	Formal and informal engagement with respect to emerging growth and how the authority is seeking to deliver this through the new Local Plan, including how growth of neighbouring authorities could impact Dacorum.
Buckinghamshire Council	Formal and informal engagement with respect to emerging growth and how the authority is seeking to deliver this through the new Local Plan. Also some engagement in relation to the preparation of the HRA with respect to Chiltern Beechwoods SAC, part of which lies within Buckinghamshire.

Other engagement with key stakeholders

4.5 In addition to those listed above, the Council has engaged with a wide range of internal and external stakeholders as the site selection process has evolved. A summary of this engagement is presented below:

Table 12 - Engagement with other key stakeholders

Stakeholder	Type of engagement
Thames Water and Affinity Water	Informal engagement to discuss the potential impact of sites on the water and waste water network and associated infrastructure.
Hertfordshire Constabulary	Informal engagement to discuss the impact of growth and better understand the likely requirements arising from growth.
Canal and River Trust	Informal engagement to understand how sites could impact upon existing waterways, including rivers and canals in the Borough.
Chilterns AONB Conservation Board	Informal engagement to discuss the approach to site selection.
Gas and electricity providers • UK Power Networks • National Grid • Southern Gas Network	Informal engagement to discuss the potential impact of sites on the gas and electric power networks and their associated infrastructure.
National Trust – Ashridge Estate	Informal engagement to discuss recreational and air quality impacts on Ashridge Estate, which forms part of the Chiltern Beechwoods SAC, to inform the Habitat Regulations Assessment.
Dacorum Borough Council - Planning and other services: • Development Management; • Housing; • Environmental Health; • Conservation.	Internal workshops to discuss emerging policies in the plan, including general and site specific policy requirements, and the identification of any gaps where appropriate.

4.6 The Council has engaged with a large number of site promoters and landowners throughout the site selection process, to gain a better understanding of constraints and what evidence has been prepared to date for each site.

4.7 Engagement with all stakeholders, including local residents, businesses, statutory, non-statutory, formal or informal, have played a key role in the Council coming to its view on what sites are most suitable to meet the strategy of the new Local Plan.

5. Key Issues

5.1 This section expands upon some of the key issues identified in relation to the site selection process, based on comments received through public consultation and also how the Council has sought to address further matters identified since the last consultation, including responding to certain changes in national policy.

Site selection methodology

Why have no sites in the AONB been considered for detailed testing?

5.2 The AECOM Site Assessment considered sites promoted for development and allocation in the new Local Plan, including sites promoted in the Chilterns AONB. The approach undertaken by AECOM for sites in the AONB was to discount these where they are over 0.5 hectares, unless they comprised of previously developed land. The sites discounted from the study are set out in Table 3 of that assessment. In effect, this discounted almost all of the sites in the AONB. This approach has also been followed for the subsequent addendum prepared for a number of late/omission sites that were also promoted to the Council.

5.3 The Council attaches great weight to the conservation and enhancement of the AONB through the new Local Plan. Paragraph 172 recognises that Areas of Outstanding Natural Beauty, alongside National Parks and the Broads, have the highest status of protection. The same paragraph is clear that "the scale and extent of development within these designated areas should be limited".

5.4 Unlike the Green Belt designation, the boundaries of the AONB cannot be reviewed through the preparation and review of Local Plans. The Council recognises that the development of Green Belt land outside of the AONB has the potential to adversely impact landscape character, including on the setting of the AONB.

5.5 The Council's approach to site selection (at Stage 6 of the methodology) is to first consider if there is sufficient sites available on land outside of the Chilterns AONB, including the consideration of (reasonable) alternative sites, which are capable to meet the development strategy of the Local Plan. If this approach concluded that there was an insufficient amount of land/sites capable of meeting future needs, then there would be a greater justification to consider in further detail those sites located in the AONB.

5.6 The review at Stage 6 demonstrates there are sufficient sites that are available, and therefore the Council considers it appropriate to not carry forward any sites in the AONB for detailed testing. The development strategy reflects the Council's commitment to protect the special characteristics of the Chilterns AONB through the new Local Plan, and considers the approach taken is soundly based.

How does the Local Plan identify sufficient smaller sites (less than one hectare) to meet 10% of the overall housing requirement?

5.7 Paragraph 68 of the NPPF recognises the important role that small and medium sized sites can make in meeting the housing requirement of an area, including their ability to deliver in the short term. With this, national policy requires local planning authorities to "identify, through the development plan and brownfield

registers, land to accommodate at least 10% of their housing requirement on sties no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why the 10% target cannot be achieved".

5.8 The Council has considered this particular point in detail, drawing upon historic evidence of completions as well as known commitments. Much of the information on smaller scale developments is presented in the windfall section of the Urban Capacity Study. The evidence demonstrates that small and medium sized sites (up to one hectare) make an important contribution towards housing supply, however the vast majority of these do not require allocation in a development plan (i.e. Local Plan) for them to come forward.

5.9 The draft Local Plan sets a minimum housing requirement of 16,596 dwellings to be delivered up to 2038. 10% of this figure is 1,660 dwellings and national policy states that the development plan should identify sufficient small/medium sites to deliver this requirement.

5.10 The Council's review of known commitments (from 1 April 2020) has identified a sufficient supply of such sites to meet this need. With this, over 1,000 dwellings (1,008) have permission to be delivered through major developments of small sites. A further 721 homes will be delivered through permissions on smaller schemes. Combined, these meet the minimum requirements set out in national policy, and details of these sites are included in Appendix 2 of the draft Local Plan.

5.11 In addition to this, a number of existing allocations and recommended new allocations in urban areas are proposed on sites smaller than one hectare, and these have the potential to make a further contribution of c.1,000 dwellings towards housing supply. Overall the contribution that smaller sites make towards the housing supply of the draft Local Plan is in excess of 16% of the overall requirement.

5.12 Given the evidence presented above, the Council believes it is less relevant to consider the release of small sites from the Green Belt, or in other rural parts of the borough. The Council does not believe that the exceptional circumstances exist to justify such small scale releases.

Why are there no residential allocations proposed outside of the six main settlements of Hemel Hempstead, Berkhamsted, Tring, Kings Langley, Bovingdon and Markyate?

5.13 The developments strategy (see separate Topic Paper) seeks to focus the majority of growth in the most sustainable locations across the borough, and in a manner that maximises the ability to deliver key infrastructure.

5.14 The six key settlements are the most sustainable locations in the district. The market towns of Hemel Hempstead, Berkhamsted and Tring, with access to high quality public transport systems and established employment areas, will deliver the vast majority of new housing and maximise the ability for existing and future

communities to access key employment and retail destinations in a sustainable manner.

5.15 Kings Langley also has a high quality public transport system, with frequent buses to Hemel Hempstead, Watford and other destinations including Berkhamsted, Tring and Aylesbury. The train station also allows sustainable links with the wider sub-region, including London.

5.16 Bovingdon and Markyate, while more limited in terms of their offering, do provide many of the essential services and facilities to serve day-to-day needs. Growth in these locations will help to consolidate their roles as important centres servicing the local communities, including those in the surrounding hinterland.

5.17 Outside of these settlements, the smaller villages and hamlets are more constrained in terms of their ability to deliver sustainable growth. No sites were promoted in these locations which seek to deliver additional sustainability benefits other than the provision of housing. It is likely that such growth would result in greater use of less sustainable modes of transport. Equally, diverting some growth to these locations could undermine the ability to deliver significant new infrastructure in the six main settlements.

5.18 The development strategy of the Local Plan allows for some small scale, but proportionate growth to occur outside of the six main settlements. The approach taken is similar to that of previous development plan documents. An assessment of historic trends over the past 12 years demonstrates that, on average, about 4% of net new dwellings come forward on land outside of the six main settlements.

5.19 The Council expects similar levels of growth to occur in the future. In the plan period, just over 500 dwellings are expected to be delivered in more rural locations, and these will be delivered through existing commitments and an allowance for windfall sites.

Has the Council considered all reasonable options before concluding that land should be removed from the Green Belt?

5.20 The Council's approach to considering this matter is set out in pages 30-33 of this topic paper. That section of the site selection methodology considers the requirements of Paragraph 137 of the NPPF in turn.

Windfall

The new windfall allowance is significantly higher than that used in the previous Core Strategy. Is this figure realistic and deliverable?

5.21 The Council has undertaken a thorough analysis of windfall sites, including a review of historic trends as well as potential future trends. The methodology, analysis and conclusions are set out in the relevant sections of the Urban Capacity Study and a summary of that work is presented in Section 3 of this Topic Paper.

5.22 The Council considers that a windfall allowance of up to 200 dwellings per annum is both robust and resilient to potential future economic influences such as Brexit and the COVID-19 pandemic. The approach to implementing the windfall allowance on an incremental basis means that the maximum allowance (of 200 dwellings) is not expected to be implemented until 2030, ensuring no double-counting occurs with windfall sites that have received planning permission.

Policy Development

What evidence is used to inform the site specific policy requirements in the new Local Plan?

5.23 The Council has followed a thorough process to develop the site specific policy requirements which it considers are important to the soundness of each proposed allocation in the draft Local Plan. The following table draws upon the various sources of evidence:

Table 13 - Sources of information informing site specific policies

Site Specific Policy Headings	Informed by (where appropriate)
Urban Design Principles	Urban Capacity Study; AECOM Site Assessment Study; Officer consideration of other matters.
Access, Highways and Sustainable Transport	Sustainable Transport Plans for Hemel Hempstead, Berkhamsted and Tring; IDP - Engagement with the lead highways authority (HCC); Urban Capacity Study; AECOM Site Assessment Study.
Social and Community	IDP - Engagement with HCC on matters relating to education provision, health, and library provision. IDP - Engagement with Herts Constabulary.
Environmental Health	Urban Capacity Study; AECOM Site Assessment; Engagement with Environmental Health; Engagement with Environment Agency.
Landscape Considerations	Landscape Assessment (Greenfield sites); Urban Capacity Study; AECOM Site Assessment Study.
Biodiversity and Green Infrastructure	Urban Capacity Study; AECOM Site Assessment; Engagement with Natural England.
Historic Environment and Cultural Heritage	Urban Capacity Study; AECOM Site Assessment; Engagement with Conservation Officer; Engagement with Heritage Officer (HCC); Engagement with Historic England.
Flood Risk and Drainage	Strategic Flood Risk Assessment Level 1; Strategic Flood Risk Assessment Level 2; Sequential and Exception Test.

6. Conclusions

6.1 This paper summarises the site selection process the Council has undertaken to identify housing-led development sites for allocation in the draft Local Plan.

6.2 A comprehensive and robust site selection process has been undertaken in accordance with national policy and guidance. A number of stages have been undertaken to ensure sites were fully assessed in terms of their sustainability. The process has been enhanced through responses received from the Issues and Options consultation. These have resulted in a number of new evidence documents being prepared which have informed officer recommendations.

6.3 All potential sites were identified from a range of sources and were assessed through the Urban Capacity Study, the AECOM Site Assessment and subsequent addendum to determine whether the sites were suitable for further consideration.

6.4 These sites were then subject to further assessment, detailed evidence testing, and informal consultation with key stakeholders. A summary of the site assessment process is provided at **Appendix A** of this Topic Paper, and sets out where sites were discounted at various stages of the site selection process, and identifies which sites have the greatest potential for meeting the strategy of the new Local Plan.

6.5 Following detailed assessment of new and revised sites and considering consultation responses received to date, it is concluded there all existing allocations (reviewed) and new urban allocations set out in the Urban Capacity Study are recommended as allocations in the draft Local Plan. The Council considers that these allocations are important to maximise the development potential in the built up area of the six main settlements of Dacorum, ensuring land is optimised in these location.

6.6 As demonstrated in Section 3 of this topic paper, the Council has explored all other reasonable options before concluding that exceptional circumstances existing to justify the allocation of sites on the edge of the six main settlements, in order to meet the remaining needs of the draft Local Plan. This has included the consideration of new settlement options on land outside of the Green Belt near to Long Marston and on previously developed land at Bovingdon Airfield, within the Green Belt. Further information on the exceptional circumstances case to justify the release of land from the Green Belt is set out in a separate topic paper on the Green Belt.

6.7 A detailed appraisal of green field sites (including sites in the Green Belt) is presented in **Appendix B**. This includes recommendations on the 16 proposed allocations in the draft Local Plan, having regard to the emerging strategy. It also includes the justification for those sites not recommended to be included.

6.8 In coming to these recommendations, the Council has given particular consideration to the role that each site could play in meeting the strategy of the draft Local Plan, including their potential to deliver new infrastructure to serve existing and future communities.

6.9 The Council is confident that the approach taken to site selection is an appropriate strategy that maximises the potential to accelerate housing delivery across the borough, while ensuring the timely delivery of infrastructure necessary to accommodate growth, including a stepped change in sustainable travel modes.

6.10 All new allocations and other development proposals will be expected to assist in delivering the Council's bold new strategy to combat climate change, and in a manner which protects the most valued natural and historic assets of the borough.

6.11 The recommended site allocations for each settlement are presented in turn over the coming pages. Feedback received through the current consultation will be taken into account, and may inform revisions to the methodology underpinning the site selection process. Feedback will also inform the recommendations on what sites are included in the new Local Plan when it is finalised alongside other evidence.

Key Developments in the whole of Hemel Hempstead

Table 14 - Recommended allocations for Hemel Hempstead

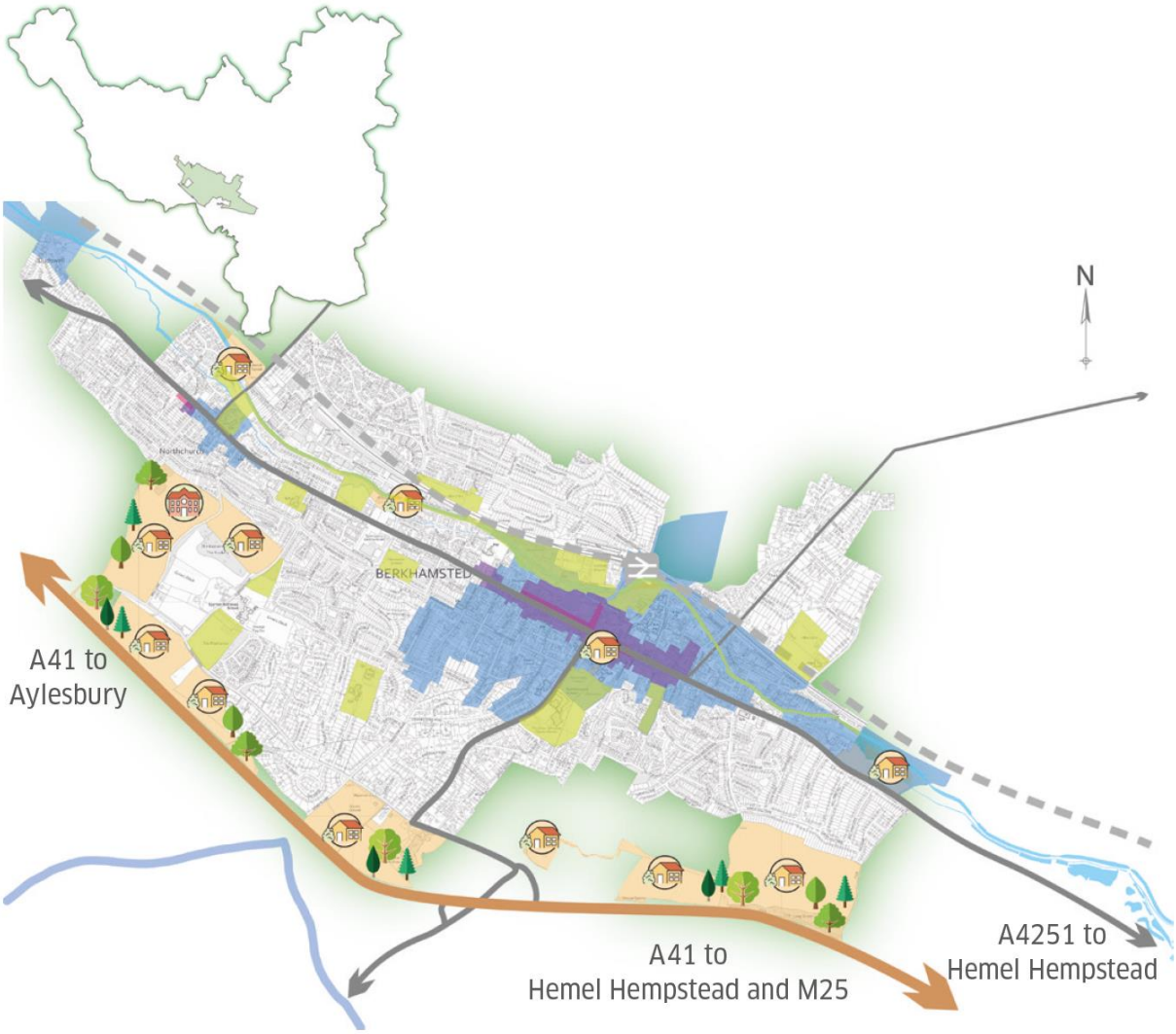
LP Ref.	Allocation	Allocated for	Status
HH01	North Hemel Hempstead (Phase 1)	1,550 dwellings*	New allocation
HH02	North Hemel Hempstead (Phase 2) - safeguarded for development post 2038	4,000 dwellings*	New allocation
HH03	Hospital Site	450 dwellings*	Existing allocation
HH04	Paradise / Wood Lane	350 dwellings*	Existing allocation
HH05	Market Square	130 dwellings*	New allocation
HH06	Civic Centre Site	200 dwellings	Existing allocation
HH07	NCP Car Park	100 dwellings*	New allocation
HH08	Station Gateway	360 dwellings*	Existing allocation
HH09	National Grid Land	400 dwellings	Existing allocation
HH10	Symbio Place, Whiteleaf Road	180 dwellings*	New allocation
HH11	Two Waters North	350 dwellings	Existing allocation (expanded)
HH12	Two Waters / London Road	60 dwellings	New allocation
HH13	Frogmore Road	170 dwellings	New allocation
HH14	233 London Road	10 dwellings	Existing allocation
HH15	Ebberns Road	30 dwellings	Existing allocation
HH17	Cupid Green Depot	360 dwellings	New allocation
HH18	Kier Park	250 dwellings	New allocation
HH19	Wood Lane End	150 dwellings	New allocation
HH21	West Hemel Hempstead	1,150 dwellings*	Existing allocation
HH22	Marchmont Farm	385 dwellings*	Existing allocation
HH23	Old Town / Cherry Bounce	90 dwellings	Existing allocation
HH24	Land at Turners Hill	60 dwellings	Existing allocation
HH25	Land to the rear of St. Margaret's Way / Datchworth Turn	50 dwellings	Existing allocation
HH26	South of Green Lane	80 dwellings	New allocation

* denotes that uses other than residential and public open space are also proposed on this site

6.12 The focus for future growth will be at Hemel Hempstead, the most sustainable location in the borough. Here, growth will be delivered through a number of existing and new urban allocations where land has been optimised and densities significantly increased in opportunity areas close to the town centre and key transport hubs. Within the Plan period around 1,500 new homes are to be provided in the Green Belt with additional land with the capacity for a further 4,000 homes, removed from the Green Belt but safeguarded to meet longer term needs beyond the Plan period. This major urban extension to the north and north-east of the town will contribute towards longer term transformative change to Hemel Hempstead.

6.13 The Council is confident that the adverse effects arising from the proposed allocations at Hemel Hempstead, identified through evidence gathered to date (including the Sustainability Appraisal), can be sufficiently mitigated through site specific and other policy requirements included in the draft Local Plan.

Key Developments in Berkhamsted



Key

- Landscaping
- Open space
- Conservation area
- Growth area
- Potential school
- New housing
- Town centre/Local centre
- Shopping
- Mixed Growth area
- GU canal, rivers Gade, Bulbourne & Ver
- Euston NW Railway
- Trunk roads
- Main roads
- Dacorum boundary

Table 15 - Recommended allocations for Berkhamsted

LP Ref.	Allocation	Allocated for	Status
Bk01	South of Berkhamsted	850 dwellings*	New allocation
Bk02	British Film Institute	90 dwellings	New allocation
Bk03	Haslam Playing Fields	150 dwellings	New allocation
Bk04	Land between Hanburys and A41	70 dwellings	New allocation
Bk05	Blegberry Gardens	80 dwellings	New allocation
Bk06	East of Darrs Lane	200 dwellings	New allocation
Bk07	Lock field, Northchurch	60 dwellings	New allocation
Bk08	Rossway Farm (land between Shootersway and A41)	200 dwellings	New allocation
Bk09	Bank Mill Lane	50 dwellings	New allocation
Bk10	Hanburys, Shootersway	40 dwellings	Existing allocation
Bk11	Billet Lane (Jewson site)	40 dwellings	New allocation
Bk12	Berkhamsted Civic Centre	16 dwellings*	Existing allocation
Bk13	Gossoms End / Billet Lane	30 dwellings*	Existing allocation

* denotes that uses other than residential and public open space are also proposed on this site

6.15 Significant growth is planned for the market town of Berkhamsted, which will enable the delivery of new infrastructure, including sustainable transport schemes, new primary and secondary schools, local/community centres, enhancements to health facilities and significant new open spaces. This growth is necessary to consolidate the town's role as the most sustainable location outside of Hemel Hempstead, ensuring that the necessary infrastructure is in place to support existing and future communities while maintaining the vitality and viability of the town centres.

6.16 The Council is confident that the adverse effects arising from the proposed allocations at Berkhamsted, identified through evidence gathered to date (including the Sustainability Appraisal), can be sufficiently mitigated through site specific and other policy requirements included in the draft Local Plan.

Key Developments in Tring

Key

- Landscaping
- Open space
- Conservation area
- Growth area
- Potential school
- New housing
- New employment
- Town centre/Local centre
- Mixed Growth area
- GU canal, rivers Gade, Bulbourne & Ver
- Euston NW Railway
- Trunk roads
- Main roads
- Dacorum boundary

Table 16 - Recommended allocations for Tring

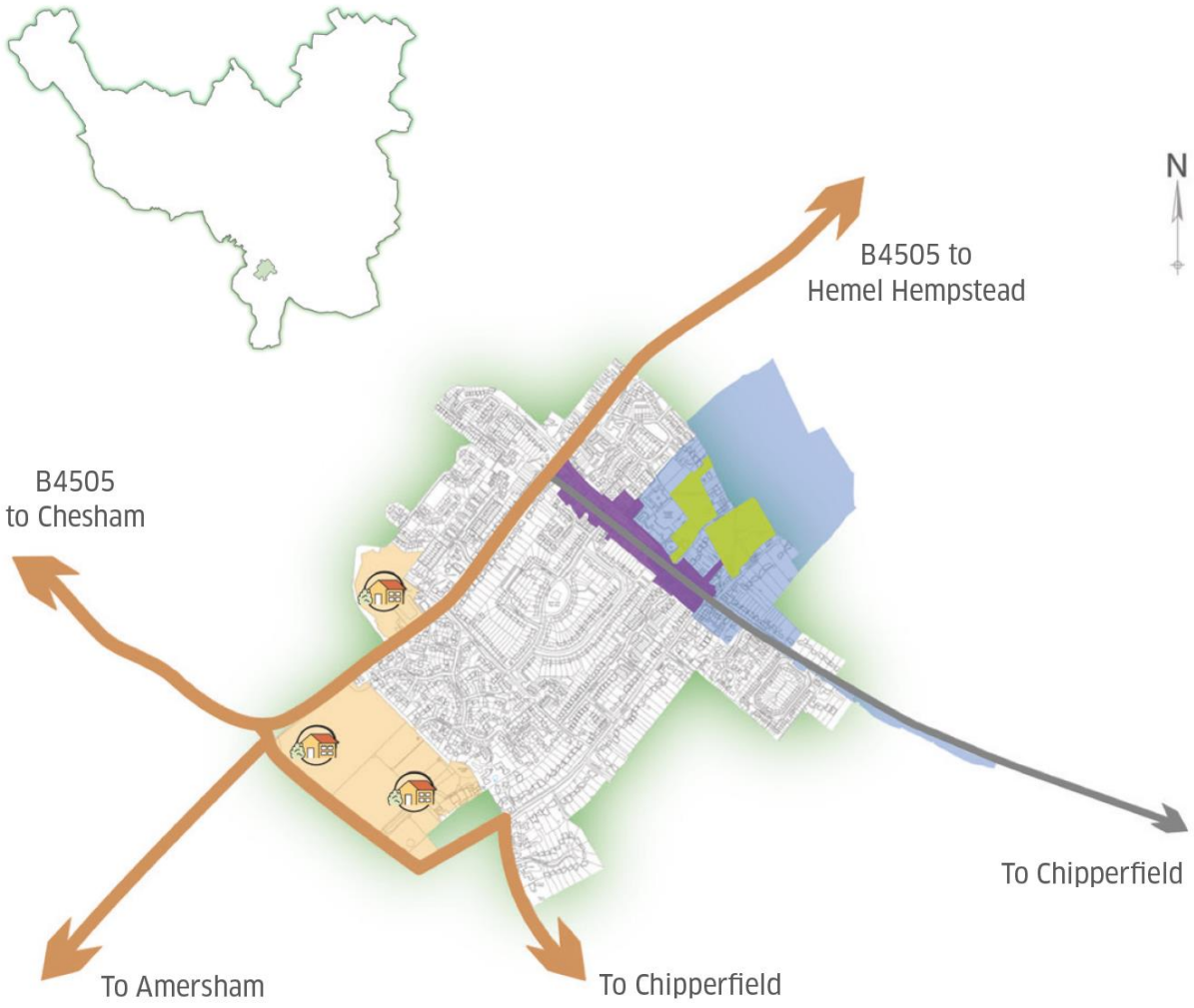
LP Ref.	Allocation	Allocated for	Status
Tr01	Dunsley Farm	400 dwellings*	New allocation
Tr02	New Mill	400 dwellings	New allocation
Tr03	East of Tring	1,400 dwellings*	New allocation
Tr04	Icknield Way	50 dwellings	Existing allocation
Tr05	Miswell Lane	24 dwellings	Existing allocation

* denotes that uses other than residential and public open space are also proposed on this site

6.17 Significant growth is planned for the market town of Tring, which will enable the delivery of new infrastructure, including sustainable transport schemes, new primary and secondary schools, local/community centres, enhancements to health facilities and significant new open spaces. This growth is necessary to consolidate the town's role as the most sustainable location outside of Hemel Hempstead and Berkhamsted, ensuring that the necessary infrastructure is in place to support existing and future communities while maintaining the vitality and viability of the town centres.

6.18 The Council is confident that the adverse effects arising from the proposed allocations at Tring, identified through evidence gathered to date (including the Sustainability Appraisal), can be sufficiently mitigated through site specific and other policy requirements included in the draft Local Plan.

Key Developments in Bovingdon



Key

- Open space
- Conservation area
- Growth area
- Town centre/Local centre
- Trunk roads
- Main roads
- New housing

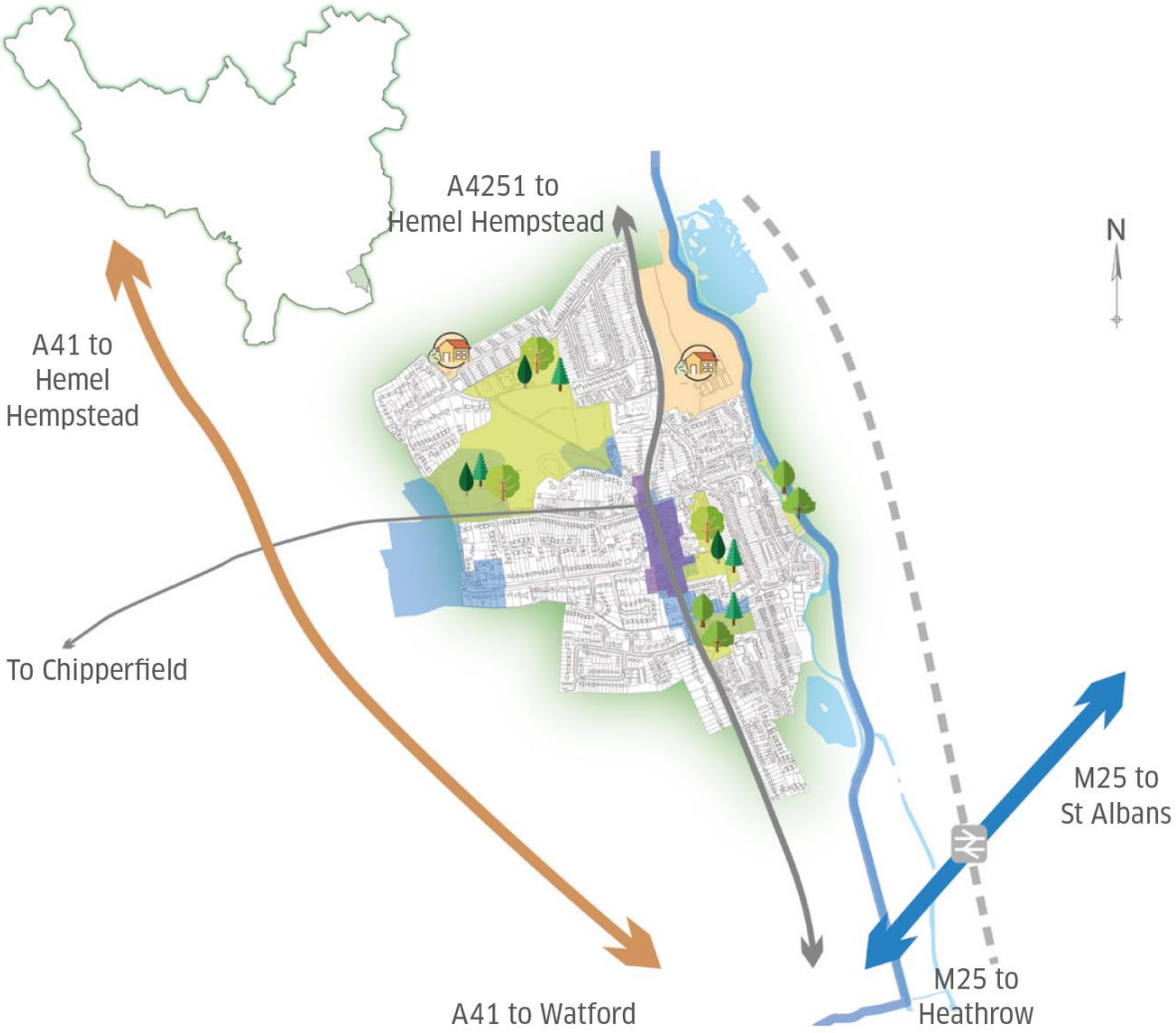
Table 17 - Recommended allocations for Bovingdon

LP Ref.	Allocation	Allocated for	Status
Bv01	Grange Farm	150 dwellings	New allocation
Bv02	Chesham Road / Molyneaux Avenue	40 dwellings	Existing allocation

6.19 A smaller scale of growth is proposed for Bovingdon, recognising the more constrained nature of the village to expand, but building upon its ability to serve many of the day-to-day needs of existing and future residents and those in the surrounding rural hinterland.

6.20 The Council is confident that the adverse effects arising from the proposed allocations at Bovingdon, identified through evidence gathered to date (including the Sustainability Appraisal), can be sufficiently mitigated through site specific and other policy requirements included in the draft Local Plan.

Key Developments in Kings Langley



Key

- Landscaping
- Open space
- Conservation area
- Growth area
- New housing
- Town centre/Local centre
- GU canal, rivers Gade, Bulbourne & Ver
- Euston NW Railway
- Motorway
- Trunk roads
- Main roads
- Dacorum boundary

Table 18 - Recommended allocations for Kings Langley

LP Ref.	Allocation	Allocated for	Status
KL01	Coniston Road	10 dwellings	Existing allocation
KL02	Rectory Farm	145 dwellings[#]	New allocation

[#] Rectory Farm has planning permission for a further 55 dwellings, which form part of known commitments.

6.21 A smaller scale of growth is proposed for Kings Langley, recognising the more constrained nature of the village to expand, but building upon its ability to serve many of the day-to-day needs of existing and future residents and those in the surrounding rural hinterland.

6.22 The Council is confident that the adverse effects arising from the proposed allocations at Kings Langley, identified through evidence gathered to date (including the Sustainability Appraisal), can be sufficiently mitigated through site specific and other policy requirements included in the draft Local Plan.

Key Developments in Markyate

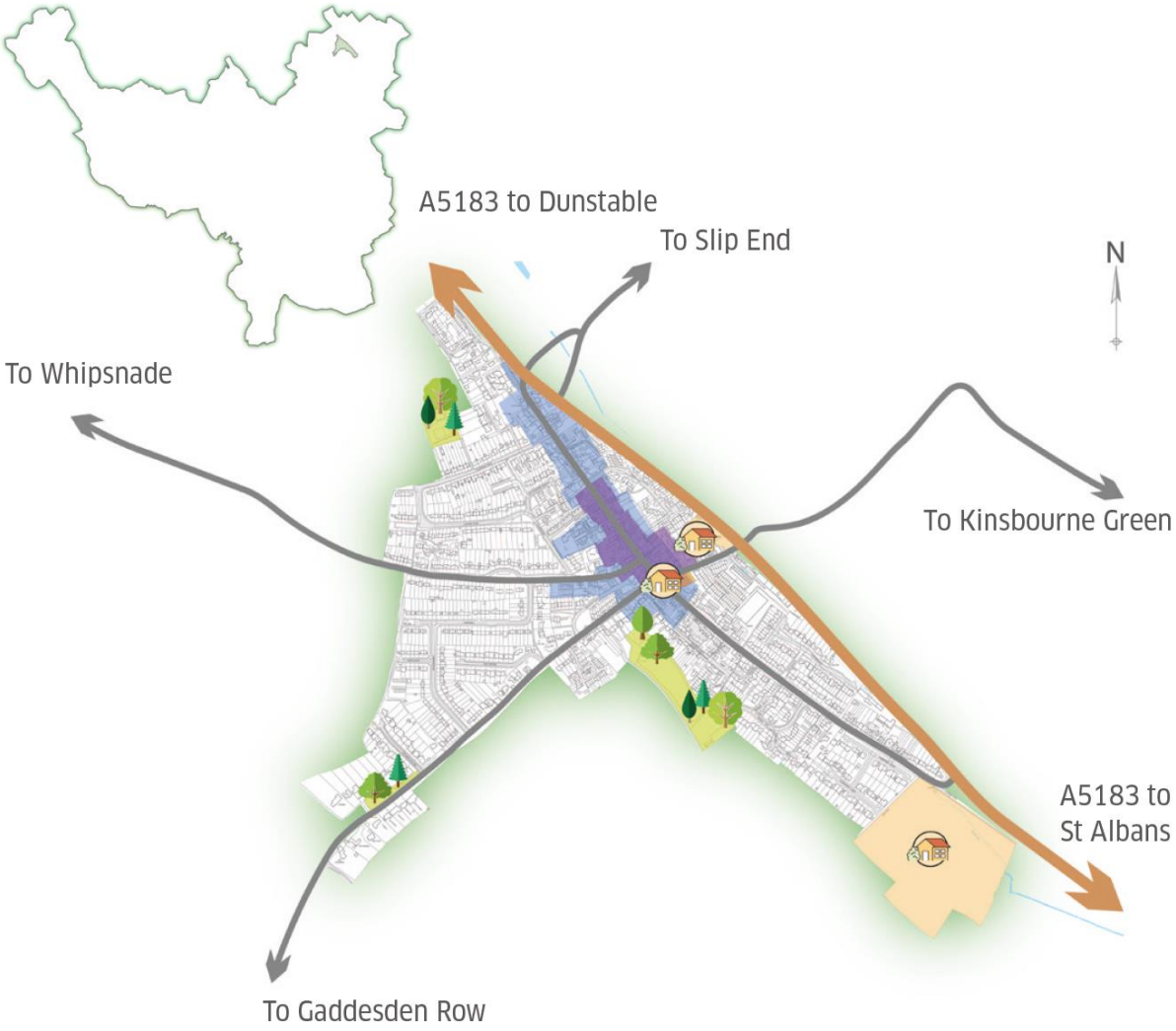


Table 19 - Recommended allocations for Markyate

LP Ref.	Allocation	Allocated for	Status
Mk01	South of London Road	150 dwellings	New allocation
Mk02	Corner of Hicks Road / High Street	13 dwellings	Existing allocation
Mk03	Watling Street	20 dwellings	Existing allocation

6.23 A smaller scale of growth is proposed for Markyate, recognising the more constrained nature of the village to expand, but building upon its ability to serve many of the day-to-day needs of existing and future residents and those in the surrounding rural hinterland.

6.24 The Council is confident that the adverse effects arising from the proposed allocations at Markyate, identified through evidence gathered to date (including the Sustainability Appraisal), can be sufficiently mitigated through site specific and other policy requirements included in the draft Local Plan.