



# **Dacorum Borough Council**

## **Local Planning Framework**

### **DACORUM CORE STRATEGY EXAMINATION IN PUBLIC**

**Statement by Dacorum Borough Council**

**Issue 1: Basis for the Overall Strategy**

**September 2012**

## **Purpose of this statement**

The purpose of this statement is to summarise the Council's position regarding the following issues raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

## Matters raised by Inspector

- 1.1 Does the DPD have regard to national and regional policy and if there are any divergences how are these justified? What are the implications of the forthcoming revocation of Regional Spatial Strategies? Are there satisfactory linkages with the Dacorum Sustainable Community Strategy and other local strategies?
- 1.2 In general terms is the overall strategy based on a sound assessment of the social-economic and environmental characteristics of the area and are the impacts of the proposals properly addressed? Would an appropriate balance between providing new homes and safeguarding the quality of life of existing residents be achieved?
- 1.3 Is the DPD based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances. Is there too much reliance on the preparation of 'subsequent plans' and are such plans identified in the Local Development Scheme?
- 1.4 Will the Strategic Objectives (page 37) satisfactorily address the identified challenges (page 29)?
- 1.5 Is the relationship between the Core Strategy, the Dacorum Borough Local Plan (1991-2011) and the Proposals Map sufficiently clear?

## Dacorum Borough Council's Response

- 1.1 **Does the DPD have regard to national and regional policy and if there are any divergences how are these justified? What are the implications of the forthcoming revocation of Regional Spatial Strategies? Are there satisfactory linkages with the Dacorum Sustainable Community Strategy and other local strategies?**
  - 1.1.1 Figure 7 (as amended by minor change MC7) highlights the main strategies that link with the Core Strategy and wider Local Planning Framework. These strategies will be reviewed and updated over time. The Core Strategy has been written so as to be flexible enough to reflect these updates.
  - 1.1.2 The Council has used Government policy (as it existed) to inform development of the Core Strategy and maintained a check on policies against the National Planning Policy Framework (NPPF) (Examination Document REG15) in both its draft and final form. The NPPF compliance checklist produced by the Planning Advisory Service (PAS) has been completed (Examination Document OT7) and highlights no significant divergence with current national policy. Where the Core Strategy did differ in approach from the new NPPF (i.e. in terms of the approach towards development in the Green Belt and rural areas),

this has been addressed through minor changes to the Pre-Submission draft that have been agreed by the Council, subjected to Sustainability Appraisal and submitted to the Inspector alongside the Pre-Submission Core Strategy (Examination Document SUB5).

- 1.1.3 Following testing through technical work and public consultation, a substantial amount of policy has been brought forward from the existing Dacorum Borough Local Plan 1991-2011 (Examination Document OT1) as it is considered to remain sound and appropriate for the Borough. There is therefore a continuum in terms of the broad approach to issues such as the settlement strategy and the Green Belt (except in some areas of detail).
- 1.1.4 The NPPF supports the approach taken in the newer thrusts of the Core Strategy i.e. those policy areas which were either absent or weak in the Local Plan, such as sustainable design and construction, design and water management.
- 1.1.5 The Council has sought to ensure key regional policies are reflected within the Core Strategy. The East of England Plan, the Regional Strategy (RS) (Examination Document REG7) for the area, was prepared in the context of national policies, the most important of which will be taken forward through the Core Strategy and subsequent DPDs. The Emerging Core Strategy (Examination Document SUB1) was checked by the former Regional Office for compliance with RS and found to be in conformity. There has been no significant change in policy approach since this time.
- 1.1.6 The Regional Strategy remains part of the development plan for the Borough. The implications of the imminent removal are expected to be limited. It does not contain a housing target for the Borough, since this was quashed as a result of a high court legal challenge brought by Hertfordshire County Council and St Albans City and District Council (Examination Document REG17). The main implications are longer term i.e. beyond the plan period, when co-operation between adjoining local planning authorities will be vital to sustain a co-ordinated approach to strategic planning policy. The Council will continue to proactively engage and co-operate with other local planning authorities to ensure key issues are addressed in absence of any regional planning policies (see Statement of Compliance with Duty to Co-Operate, Examination Document SUB8). The new Planning Coordinator being appointed by the Hertfordshire Planning Group will have an important role to play in facilitating this engagement.
- 1.1.7 The Core Strategy has strong links with the Council's Sustainable Community Strategy (SCS), entitled 'Towards 2021' (Examination Document BP3). The SCS vision of *"Working together to make Dacorum a happy, healthy, prosperous and safe place to live, work and visit"* is incorporated into the beginning of the Core Strategy vision. The Local Strategic Partnership have had input into the Core Strategy throughout its development (see Report of Consultation, Examination Document SUB6). Links between the SCS's objectives and the objectives and policies of the Core Strategy are illustrated in Figure 8 of the Pre-Submission document (Examination Document SUB1)

1.1.8 Following a recent restructure of the Local Strategic Partnership (LSP), a new SCS – entitled ‘Destination Dacorum’ has been prepared (Examination Document BP8). This was considered by the Council’s Cabinet in July 2012, and is due to be formally adopted by Full Council on 26 September. In order to reflect the content of the new SCS, some further minor changes are proposed to the Core Strategy. None of these are substantive, and will logically include updates to:

- the second line of the Borough Vision to reflect the revised principles in the SCS (‘a better pace to live’, ‘a better place to work’ and ‘a better place to enjoy.’ )
- Figure 7 to refer to the new title of the SCS.
- paragraph 5.1 of the supporting text to refer to both old and new strategies and the fact that the Core Strategy reflects the aspirations of both.
- glossary to reflect changes to the organisations that make up the new LSP.

1.1.9 The SCS for Hertfordshire (Examination Document REG6) remains unchanged. It is clearly referenced in Figure 7: Other Key Document and Strategies, and paragraph 7.3 of the supporting text.

1.1.10 Other local strategies are recognised and referred to as appropriate – within Figure 7; in policies and supporting text throughout the Core Strategy; in the delivery sections that follows each policy / group of policies; and in Appendix 3: Delivery Mechanisms for the Vision and Strategic Objectives. For example, the Local Transport Plan and local Urban Transport Plans are referenced in Policy CS8: Sustainable Transport and the Chiltern Conservation Board’s Management Plan is referenced in Policy CS24: The Chilterns Area of Outstanding Natural Beauty.

**1.2 In general terms is the overall strategy based on a sound assessment of the social-economic and environmental characteristics of the area and are the impacts of the proposals properly addressed? Would an appropriate balance between providing new homes and safeguarding the quality of life of existing residents be achieved?**

1.2.1 In developing the Core Strategy the Council has gone through a long process of evidence gathering; testing issues and options; responding to alternative growth scenarios and consultation (both formal and informal). It has considered infrastructure requirements, taken advice from infrastructure providers and carried out a systematic appraisal via Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Habitats Regulation Assessment (Examination Documents CS7 and SUB4). See response to question 1.3 below for a further explanation regarding the integral role played by sustainability appraisal (SA) and strategic environmental assessment (SEA) in plan development.

1.2.2 Technical evidence comprises a series of studies undertaken either in-house, or by specialist independent consultants (see full list on the Council’s

Examination webpage [www.dacorum.gov.uk/corestrategyexamination](http://www.dacorum.gov.uk/corestrategyexamination)). Whilst the Council has followed the majority of these independent recommendations, this has not been possible in all cases due to wider planning considerations or the need to take account of new Government policy.

1.2.3 The Core Strategy has also considered the strategic context, through an evaluation of the Borough's characteristics, an evaluation of current Dacorum Borough Local Plan 1991-2011 (Examination Document OT1) and a review of the performance of policies within it. This has helped to inform consideration of the socio-economic and environmental characteristics of the Borough set out within the Borough Portrait (section 3) and highlight the main challenges faced by the Borough (as outlined in section 4).

1.2.4 The Core Strategy comprises a series of general policies and specific development proposals. These have been assessed against a comprehensive sustainability framework, covering a range of social, economic and environmental considerations (see Table 4-2 of Examination Document SUB3 and SUB7). The Sustainability Report is structured to ensure that as well as providing feedback on individual policies and groups of policies, it assesses the strategy on the basis of the following SA/SEA objectives:

- Biodiversity;
- Water, flood risk and soil;
- Climatic factors and air quality;
- Cultural heritage and landscape;
- Population and human health;
- Equity, housing, communities and crime; and
- Economic factors;

This assessment includes the consideration of cumulative, synergistic and secondary effects. Cross-boundary effects have also been considered (see section 6.10 of Examination Document SUB3).

1.2.5 A comprehensive assessment has been carried out for three potential options for the outward expansion of Hemel Hempstead (Examination Document HG10). This assessment was prepared jointly with Officers from St Albans City and District Council. The methodology was agreed with, and informed by, Hertfordshire County Council (in their capacity as local Highway Authority, Local Education Authority and Dacorum's archaeological and ecological advisers) and was assessed by the Council's sustainability consultants to ensure compatibility with the approach set out in the Sustainability Scoping Report (Examination Document CS2).

1.2.6 A complementary methodology was used to assess potential local allocations and strategic sites across the Borough (including those at Hemel Hempstead) (Examination Document HG15). This assessed each location using a comprehensive three-stage approach, with the number of options reduced at each stage, as inappropriate locations are rejected:

**Stage 1**

- Assess all sites against key environmental designations and broad deliverability criteria.

- Discount those locations that fail to meet the requirements

### **Stage 2**

- Consider remaining sites against Green Belt criteria in PPG2.
- Discount those locations that undermine the requirements and objectives for including land within the Green Belt.

### **Stage 3**

- Consider remaining sites against wider sustainability criteria and assess compliance with the place vision and objectives.

1.2.7 Combined with the results of public consultation and technical work, these assessments have helped inform development of the Place Strategies for the Borough's towns, large villages and the countryside.

1.2.8 The likely impacts of Local Allocations LA1 (Marchmont Farm, Hemel Hempstead), LA3 (West Hemel Hempstead), LA4 (Hanburys), LA5 (Icknield Way, Tring) and LA6 (Chesham Road, Molyneaux Avenue, Bovington) have been assessed through the production of joint planning statements (within the associated Statements of Common Ground: Examination Documents SG1, SG2, SG3, SG5, SG6 and SG7) and associated site-specific technical work (Examination Documents with the JS pre-fix). For LA2 (Old Town, Hemel Hempstead), which is within the Council's own ownership, an independent site assessment has been carried out by Tibbalds (Examination Document SG8). Master plans for the strategic sites play a similar role (See Examination Documents SS1 and SS2). In all cases, where any potential negative impacts are highlighted, appropriate mitigation and amelioration measures are identified. For the local allocations, these will be further refined through work on the Site Allocations DPD and accompanying site master plans.

1.2.9 The issue of balance between providing new homes and safeguarding the quality of life for existing residents has been given careful thought by the Council. The Council has taken into consideration the balance between homes and jobs as well as the quality of life within different communities.

1.2.10 As set out in the response to Issue 6: Providing Homes and in Examination Document HG16, the Council has tested a range of different housing targets and levels of change at different places, as well as for the Borough as a whole. The need to strike an appropriate balance between the need for new homes and the need to safeguard the quality of life for existing residents and protect the environment have been important factors when choosing the level of housing now proposed.

1.2.11 Policies on the management of development land supply help to safeguard the quality of life for existing residents – not only in terms of infrastructure (Policy CS35) but guiding the distribution, pace and nature of change (Policies CS1 – CS3). Design policies (CS10-CS13) will help ensure the integration of new development and ensure this has regard to existing settlement character. Policies relating to carbon emissions and sustainable construction (Policies CS28-30) will help reduce the impact of new development upon the

environment, whilst Policies CS24-27 will ensure the historic and natural environment is protected and enhanced. The promotion of new job and commercial opportunities should also have a positive effect upon existing residents' quality of life (Policies CS14-CS16)

**1.3 Is the DPD based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances. Is there too much reliance on the preparation of 'subsequent plans' and are such plans identified in the Local Development Scheme?**

1.3.1 The integration of Sustainability Appraisals (incorporating Strategic Environmental Assessment) into production of the Core Strategy has been a principal objective of the Council. This iterative approach is illustrated by Table 1-1 in the SA Addendum Report (Examination Document SUB7), reproduced here as Appendix 1. The same independent consultants (C4S) have acted as advisers throughout the Core Strategy's development (working with Halcrow for the initial scoping report that covered a number of neighbouring districts and which included a stakeholder workshop). This has ensured consistency of approach and a full understanding of the issues faced within the Borough.

1.3.2 Through the development of the Core Strategy a wide range of both strategic and more detailed options have been developed, consulted upon and assessed through the process of sustainability appraisal. This has enabled the testing of the strategy and policies within it on an iterative basis to create the most appropriate approach for local circumstances. It has involved consideration of:

- The overall level of growth and change;
- Options for different locational distributions of this growth and change;
- Growth scenarios for the outward expansion of Hemel Hempstead;
- The sustainability performance of individual policies / groups of policies;
- The performance of the plan when assessed against a number of sustainability criteria;
- The performance of a range of options for the choice of strategic sites and local allocations.

a) The overall level of growth and change and options for its distribution

1.3.3 A Sustainability Appraisal Report (Examination Document SUB3), updated by an Addendum Report (Examination Document SUB7) accompanied the Pre-Submission Core Strategy (Examination Document SUB1). Section 5 of the SA Report provides a summary of the assessments undertaken at various stages in the development of the Core Strategy and the wide range of options and alternatives that were considered for delivering the plan objectives. Further detail is set out within the relevant SA Working Note or Draft SA Report that accompanied that stage (see Examination Documents CS4, CS6,



CS9, CS10, CS15 and CS17). The role of each key stage in testing reasonable alternatives is summarised below. The sustainability appraisal work that accompanied each stage has helped the Council to understand and assess the implications of the different options for growth.

1.3.4 Further explanation of the housing levels tested, and the reason for the choice of the current target is set out in the 'Background Paper: Selecting the Core Strategy Housing Target' (Examination Document HG16). A summary table showing the range of housing levels tested is reproduced in Appendix 2. See also the response to Issue 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt, and to question 6.3 of Issue 6: Providing Homes, which considers the apportionment of growth between settlements.

*Issues and Options (2006):*

- 1.3.5 A number of strategic options were considered at this stage, including:
- Distribution patterns for housing and growth across the Borough; and
  - Options for the location of potential greenfield extensions (if required)
- 1.3.6 This included the option of either concentrating development (both housing and employment) at Hemel Hempstead, or distributing this development more evenly between Hemel Hempstead, Berkhamsted and Tring. Whilst there were assessed to be merits to both options, the former performed better overall against the SA objectives. It was also noted that concentrating development at Hemel Hempstead complies with the approach set out in the East of England Plan (Examination Document REG7). Informed by the findings of this assessment, combined with the results of consultation (see Volume 1 of the Report of Consultation: Examination Document SUB6), the concentration of development at Hemel Hempstead, with a lesser role for the two market towns was chosen as the preferred option for the spatial strategy.
- 1.3.7 Options for locating greenfield extension(s) at Hemel Hempstead, Berkhamsted, Tring and other smaller settlements was also covered at this stage – although no locational assumptions were made regarding sites. The sustainability assessment considered the towns to be the preferable location for any such outward expansion, with Hemel Hempstead marginally favoured above the two market towns.
- 1.3.8 The following housing growth scenarios were also considered:
- Adopting the East of England Plan assumption (as it then stood) of 6,300 dwellings;
  - The Council's estimate of housing need of 7,100 dwellings;
  - The East of England Plan's original proposal of 8,200 dwellings; and
  - 10,000 dwellings suggested by objectors to the East of England Plan.

These options are explained further in Background Paper – Selecting the Core Strategy Housing Target (Examination Document HG16).

1.3.9 A number of less strategic options, such as those relating to housing density, land-use patterns in town and local centres, transport, accessibility and

community facilities were also considered at this stage.

1.3.10 In conjunction with St Albans City and District Council, the Council also consulted upon options for growth to meet the proposed extra housing at Hemel Hempstead, recommended by the East of England Plan Panel Report, which had not originally featured in that draft Plan. See section (b) below. No preferred option for an urban extension was selected at this stage.

*Emerging Core Strategy (2009 and 2010):*

1.3.11 The Emerging Core Strategy (Examination Document CS8) took forward the preferred option of focussing the majority of development at Hemel Hempstead. Options for housing levels were influenced by uncertainty as to the result of a high court legal challenge to the East of England Plan, which placed a requirement for 17,000 new homes in the Borough, with growth focussed at Hemel Hempstead. Due to these uncertainties housing growth of 9,000 dwellings was assumed at a level of 360 dwellings per year i.e. the same annual rate as contained within the Dacorum Borough Local Plan.

1.3.12 This consultation was followed by consideration of three strategic growth options at Hemel Hempstead, as set out under (b) below and in paragraph 1.2.5 above. Whilst these options were subject to sustainability appraisal, the document was not published for public consultation due to the quashing of the Borough's housing target in the East of England Plan (Examination Document REG17) as a result of successful legal action brought by Hertfordshire County Council and St Albans City and District Council.

*Draft Core Strategy (2010)*

1.3.13 Unlike the Emerging Core Strategy, the Draft Core Strategy tested additional growth at Berkhamsted and Tring, albeit at a lesser scale than proposed at Hemel Hempstead. This reflects the spatial strategy in the Pre-Submission Core Strategy.

1.3.14 Feedback was sought on two housing levels:

- Option 1: 370 dwellings per annum; and
- Option 2: 430 dwellings per annum.

Both options were subject to sustainability appraisal, together with a third option of 500 dwellings per annum, which broadly equates to the predicted natural growth of the population. This higher level of growth was assessed to have adverse effects on several of the environmental objectives within the sustainability appraisal framework, including a significant adverse effect upon landscape and townscape objectives. The Pre-Submission Core Strategy takes forward the Option 2 level of 430 dwellings per annum.

1.3.15 The Draft Core Strategy proposed a target of up to 18,000 additional jobs in the Borough between 2006 and 2031. This level of jobs growth was based upon the very high levels of housing development contained in the East of England Plan before it was quashed. In order to ensure a better balance of

jobs and homes, this jobs growth figure was reassessed (Examination Document ED12) and the figure reduced to the level of 10,000 jobs contained within the Pre-Submission Core Strategy.

b) Growth scenarios for the outward expansion of Hemel Hempstead

1.3.16 As part of developing the Core Strategy, the Council has considered a number of different scenarios for Hemel Hempstead. Firstly it considered the relative merits of creating new neighbourhoods and extensions to existing neighbourhoods around the town, as part of the Issues and Options stage (Examination Document CS5). This document was consulted upon jointly with St Albans Council as it included sites within their area and was subject to sustainability appraisal (Examination Document CS6).

1.3.17 The second assessment related to three alternative growth scenarios for the town – an eastern growth strategy, a northern growth strategy and a dispersed growth strategy. This document was also produced jointly with St Albans Council, as it included consideration of growth eastwards into the adjoining district. This too was subject to sustainability assessment (Examination Document CS10).

See also response to question 1.2 above.

c) The sustainability performance of policies

1.3.18 In the early stages of development of the Core Strategy, SA Working Notes provided an important check of issues and options against the sustainability framework. From the Consultation Draft Core Strategy onwards, these SA Working Notes and Draft SA Reports have provided an assessment of the performance of individual policies themselves. This has included highlighting any deficiencies in coverage or wording, and suggesting how this could be improved. This advice has helped shape the Pre-Submission Core Strategy.

1.3.19 Appendix E of the Sustainability Report (Examination Document SUB3) contains a final assessment of the performance of each policy, or where they are closely linked, a small group of policies. This assessment differentiates between permanent and temporary effects; whether the impacts are likely to be local, regional or national; and assesses the significance of the expected impact on a scale of 'very sustainable' through to 'very unsustainable'. Uncertain or neutral impacts are also noted. A summary of findings is provided in the SA Report itself. In all cases, the positive effects of the Core Strategy policies considerably outweigh any negatives.

1.3.20 The proposed minor change to the Pre-Submission Core Strategy (set out in the Report of Representations: Examination Document SUB5), have been screened by the SA consultants and those considered to have potential implications for a significant sustainability effect were assessed against the sustainability framework. This new assessment considered the implications of the amendments in terms of whether or not the Core Strategy would be more or less likely to

achieve the sustainability objectives with or without the changes. The results are set out in Table 2 in section 5 of the SA Addendum (Examination Document SUB7). None of the changes were considered to have significant positive or negative implications and some were assessed to have minor positive implications. None had any implications for the Habitats Regulation Assessment (Examination Document SUB4).

d) Performance of the strategy against sustainability criteria

1.3.21 As set out in response to question 1.2 above, as well as providing feedback on policies themselves, the SA Report also assesses the strategy as a whole against seven SA/SEA topic areas (section 6.9 of Examination Document 3). This ensures full consideration is taken of cumulative, synergistic and secondary effect. Within this assessment, the positive effects considerable outnumber any negative ones.

e) Choice of strategic sites and local allocations

1.3.22 The Council has undertaken parallel assessments of sites all the way to Emerging Core Strategy stage to ensure that the Site Allocations DPD and Core Strategy DPD have been progressed in partnership and use a consistent information base. This has enabled development of a good knowledge of available sites and ensured that there is a consistent approach towards assessing the sustainability credentials of site options. All sites considered through work on the Site Allocations DPD have been subject to sustainability testing using the same SA framework as the Core Strategy (see Examination Documents SA3 and SA4).

1.3.23 All locations put forward as potential strategic sites or local allocations within the Core Strategy have been assessed against the sustainability framework. These assessments have been carried out over the course of the Core Strategy's development, with some sites re-assessed during this period to reflect the availability of additional information (see in particular Examination Documents CS10, CS12 and CS13).

1.3.24 Where objectors queried the assessments for particular sites, or offered their own alternative assessments at the Pre-Submission stage, these have been considered by the SA consultants and their conclusions set out in the Sustainability Report Addendum (Examination Document SUB7)

1.3.25 For ease of reference, all of the site assessments have been combined into the 'Compendium of Sustainability Appraisal Assessments of Potential Strategic Sites and Local Allocations' (Examination Document CS19). This compendium does not introduce any new assessments, it merely brings all previous assessments into one place.

1.3.26 The foreword to this document explains the role this SA process has played in informing site selection. It notes that the choice of development locations, or the number of locations, was not simply a matter of achieving a good score against the SA framework, as comparisons were not necessarily made on a

like-for like basis. Other considerations also influenced the choice, including national planning policy, the effect on the Green Belt, the relative need for development in a particular area and the views of local communities and key stakeholders. The 'Assessment of Potential Strategic Sites and Local Allocations (Examination Document HG15) referred to in question 1.2 above contains a summary of the relevant sustainability assessment and a consideration of these other factors.

1.3.27 In the light of the above factors it is concluded that the approach set out in the Pre-Submission Core Strategy (incorporating proposed minor changes) represents the most appropriate strategy for the Borough.

### **Subsequent Plans**

1.3.28 With regard to the issue of 'subsequent plans', the Core Strategy represents the Council's long term planning strategy for the Borough to 2031. The Council considers that the document takes the key decisions appropriate for a Core Strategy. It provides a clear strategic framework within which future development can progress, whilst deferring more detailed issues to other Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) as appropriate.

1.3.29 Section 2 of the Core Strategy sets out the documents that will comprise the Council's replacement 'Local Plan.' This is illustrated in Figure 1: Structure of the Local Planning Framework. The role and scope of DPDs that will help achieve the vision and objectives of the Core Strategy are set out in paragraph 2.3. Key documents are explained further in the Local Development Scheme (Examination Document OT3). In effect the Core Strategy comprises 'Part 1' of the Local Plan, with the Site Allocations and Development Management DPD comprising 'Part 2.' The East Hemel Hempstead Area Action Plan (AAP) will provide additional clarity for a 'Key Regeneration Area' and address cross boundary issues, in conjunction with St Albans City and District Council.

1.3.30 This is considered to be a reasonable and logical approach to ensuring appropriate planning framework for the Borough. The Council has considered reducing the number of individual DPDs, but has concluded that current approach is best and to change the approach at this stage would delay establishing a clear planning framework for the Borough.

1.3.31 It is important for the Core Strategy to be adopted as soon as possible so as to provide a clear framework for the rapid progression of other policy documents.

1.3.32 The Site Allocations DPD has been the subject of two rounds of issues and options consultation (see Examination Documents SA1 and SA4). Issues and options have also been considered for the East Hemel Hempstead Area Action Plan (Examination Document AA1) in order to inform the Hemel Hempstead Place Strategy (section 20 of the Core Strategy).

1.3.33 The Site Allocations DPD is programmed to reach pre-submission stage in Spring 2013. Consultation on issues and options for the Development

Management DPD is also scheduled for this time. The programme is intended to enable the 'dovetailing' of consultations to speed up the overall process. The production of subsequent plans will also occur in parallel, rather than being progressed one by one in sequence.

1.3.34 Supplementary Planning Documents will provide further policy detail and are important as they are more easily updated to reflect changes in local circumstances and priorities. The delivery sections that follow each policy / group of policy cross refers to both future and existing guidance, whether this be in the form of SPDs or more informal advice.

1.3.35 The Local Development Scheme (LDS) (Examination Document OT3) sets out a detailed profile for each subsequent DPD (Annex B) and key SPDs. Other SPDs referred to in the Pre-Submission Core Strategy are referred to in Appendix E of the LDS as they were at that time unprogrammed. Whilst the LDS itself was adopted in 2009, the programme for DPD production has been updated on a yearly basis, as part of the Council's Annual Monitoring Report. The current programme is contained in the 2010/11 AMR (Examination Document BP2).

1.3.36 Since the LDS was adopted it has become clear that some additional SPDs would be beneficial, both to the Council and others involved in the planning system. For example, the climate change agenda is a fast moving area. All parties involved in planning within Dacorum would benefit from additional guidance that elaborates on the Core Strategy and can be easily updated in response to changes in Government policy and available technology.

1.3.37 Following the adoption of the Core Strategy the Council intends to update the LDS. Although not necessary, the Council considers that it is helpful to include profiles for all planned SPDs within an appendix in the revised LDS.

1.3.38 There is not an over-reliance on deferring planning policies to later documents. Rather the Core Strategy adopts a prudent balance between taking key decisions and deferring detail to subsequent documents.

#### **1.4 Will the Strategic Objectives (page 37) satisfactorily address the identified challenges (page 29)?**

1.4.1 The role of the strategic objectives is to focus action, measure progress and meet the Borough Vision (paragraph 6.1 of Pre-Submission Core Strategy: Examination Document SUB1). They have been developed as a direct response to the challenges identified.

1.4.2 It is recognised that the challenges faced by Dacorum, as for most other Boroughs, are considerable. The Council has tried to ensure that the strategic objectives are tempered by realism and are therefore considered to be deliverable, realistic and proportionate to the issues faced.

1.4.3 The table attached as Appendix 3 of this paper illustrates the main strategic objective(s) that will help address each identified challenge.

1.4.4 The strategic objectives have been checked against the objectives of current Sustainable Community Strategy (Examination Document BP3) (as set out in response to question 1.1)

1.4.5 These strategic objectives are complemented by a series of common local objectives (see section 19) and specific place-related local objectives set out in each Place Strategy (see sections 20-26 of the Pre-Submission Core Strategy). These highlight issues of specific importance to each of the Borough's towns, large villages and countryside that need to be addressed. These local objectives will also help meet the challenges identified and realise the Borough and local visions set out within the plan.

1.4.6 Both the strategic and local objectives have been subject to sustainability Appraisal (Examination Document SUB3) and scrutiny via public consultation and have been amended and clarified as a result of comments received (see Report of Consultation: Examination Document SUB6).

**1.5 Is the relationship between the Core Strategy, the Dacorum Borough Local Plan (1991-2011) and the Proposals Map sufficiently clear?**

1.5.1 As explained with regard to question 1.3 above, the introduction to Core Strategy sets out the documents that will comprise the Council's replacement 'Local Plan.' This is illustrated in Figure 1: Structure of the Local Planning Framework, with the role and scope of DPDs that will help achieve the vision and objectives of the Core Strategy set out in para 2.3. Paragraph 2.6 of this introductory section clearly states that "*Whilst documents in the Local Planning Framework are being prepared, policies in the Dacorum Borough Local Plan 1991-2011 will continue to be used to guide development until they are replaced.*" It goes on to refer to the list of superseded Local Plan policies contained in Appendix 1 of the Pre-Submission Core Strategy. To help the reader, this appendix not only lists those policies that will be superseded, but also lists the policy/policies that will replace each superseded policy.

1.5.2 It is recognised that the clarity of this table could be improved by a more explicit reference to the fact that the supersede policies relate to the Dacorum Borough Local Plan 1991-2011. This change is proposed as a further minor change.

1.5.3 Once the Core Strategy is adopted is it intended that a statement is added to paper copies of the Dacorum Borough Local Plan (and associated Proposals Map) and to the online version of the document to make it clear which policies and designations remain valid.

1.5.4 Following adoption of the Core Strategy the Council also intends to formally update its Local Development Scheme. This can include a clear statement regarding superseded policies and will update the existing Appendix A with regard to whether (and how) policies will be superseded.

**Stages in the SA/SEA and Dacorum Core Strategy DPD**

<b>Dacorum Core Strategy DPD</b>	<b>SA/SEA Stages</b>	<b>Dates</b>
<b>Begin document preparation</b>	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues and problems.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (Scoping Report).</p>	<p>SA Scoping Report, prepared February 2006.</p> <p>Consultation on Scoping Report February 2006.</p>
<p><b>Preparation of Issues and Options (I&amp;O) paper and consultation</b></p> <p><b>Preparation of preferred options, including consultation on possible preferred option</b></p>	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the DPD objectives against the SA framework.</p> <p>B2: Developing the DPD options.</p> <p>B3: Predicting the effects of the DPD.</p> <p>B4: Evaluating the effects of the DPD.</p> <p>B5: Considering ways of mitigating adverse effects preferred and maximising beneficial effects.</p> <p>B6: Proposing measures to monitor the significant effects of implementing the DPDs.</p>	<p>Consultation on Issues &amp; Options (I&amp;O) paper May 2006.</p> <p>Preparation of SA Working Note on I&amp;O<sup>1</sup> June 2006.</p> <p>Supplemental I&amp;O paper November 2006.</p> <p>Preparation of SA Working Note on Supplemental I&amp;O in November 2006.</p> <p>Consultation on the Emerging Core Strategy June – August 2009.</p> <p>Preparation of SA Working Note on the Emerging Core Strategy June 2009.</p> <p>Preparation of SA Working Notes for: Housing Growth Options at Hemel Hempstead (August 2009); Strategic Allocations (February and April 2010) and Working Draft Core Strategy (September 2010)</p>
<b>Public consultation on</b>	<p>Stage C: Preparing the Sustainability Appraisal Report.</p>	<p>Preparation of the SA Report of the Draft Core Strategy July</p>



<b>Preferred options</b>	C1: Preparing the SA Report.	- October 2010.  Preparation of SA Report of the Pre-Submission Core Strategy August – September 2011 <sup>2</sup> .  <i>Preparation of an Addendum to the SA Report to reflect changes to the Core Strategy made between the Pre-Submission and Submission stages [<u>this addendum</u>]<sup>3</sup>.</i>
	Stage D: Consulting on the preferred options of the DPD and SA Report.  D1: Public participation on the preferred options of the DPD and the SA Report.  D2 (i) Appraising significant changes.  D2 (ii) Appraising significant changes resulting from representations.  D3: Making decisions and providing Information.	Consultation on Draft Core Strategy and accompanying SA Report November 2010.  Consultation on the Pre-Submission Core Strategy and accompanying SA Report October - December 2011.  <i>Appraisal of proposed amendments to the Pre-Submission Core Strategy [<u>documented in this addendum</u>].</i>
<b>Submission of DPD to Secretary of State</b>	Stage E: Monitoring the significant effects of implementing the DPD.  E1: Finalising aims and methods for monitoring.  E2: Responding to adverse effects.  Preparing the SEA Statement. <sup>4</sup>	To be completed when the Core Strategy is adopted.  This is scheduled for Spring 2013.

<sup>1</sup> This output is not required by the SEA Regulations but was produced to assist in selecting the preferred options.

<sup>2</sup> This is the Environmental Report required by the SEA Regulations.

<sup>3</sup> This Addendum forms part of the SA Report at the Submission stage.

<sup>4</sup> The SEA Statement is required by the SEA Regulations.

## Appendix 2

### Dacorum's Changing Housing Target

Source of housing target	Average annual provision rate	Total 2001-2021	Notes
Draft revision to the Regional Spatial Strategy (RSS) for the East of England, December 2004	315	6,300	-
East of England Plan EiP Report of the Panel June 2006	530-620: See notes	12,000	Includes expansion into St Albans. The panel report gives 5 year indicative phases of levels of development. For Dacorum these are 2,650 (530) for 2001-06 and 3,100 (620) thereafter (dwellings pa in brackets).
Secretary of State's (SOS) proposed changes to the draft revision to the RSS for the East of England, December 2006	680 (2006-2021) See notes	12,000	Includes expansion into St Albans. The SOS decided to amend the figures for housing provision from 2006-2021 to take account of 2001-2006 completions (1,860) whilst leaving the Panel's recommended total for the 2001-2021 period unchanged.
SOS's proposed changes and further proposed changes to the draft revision to the RSS for the East of England, October 2007	680 (2006-2021)	12,000	Includes expansion into St Albans. The annual provision rate takes into account completions during 2001-2006.
Adopted RSS for the East of England, May 2008	680(2006-2021)	12,000	Includes expansion into St Albans. The policy required Local Planning Authorities, when setting housing targets, to assume that the annual rate of provision after 2021 will be the same as the rates in the policy for 2006 to 2021 or 2001 to 2021, whichever is higher
High Court decision following legal challenge mounted by Hertfordshire County Council and St Albans City & District Council, July 2009	-	-	The decision removed Dacorum's housing target from the RSS for the East of England.

Draft Revision to the RSS for the East of England, March 2010	310	N/A	The housing target for Dacorum over the period 2011-2031 was 6,100.
Core Strategy – Draft for Consultation, November 2010	370 (option 1)	N/A	Housing programme over period 2006-2031: 9,835. The housing programme differs slightly from the sum of the average annual provision rate because of different assumptions about windfall.*
	430 (option 2)	N/A	Housing programme over period 2006-2031: 11,835. The housing programme differs slightly from the sum of the average annual provision rate because of different assumptions about windfall.*

\* *In setting the annual target for housing, no allowance could be made for windfalls in the first ten years of the plan period, in accordance with Government guidance (now cancelled) in PPS3. However, the housing programme does make an allowance for windfalls later in the plan period.*

**Linkages between Challenges and Strategic Objectives**

The following table illustrates the main strategic objective(s) that will help address each identified challenge.

<b>Challenge</b>	<b>Related Strategic Objective(s)*</b>
1. Balanced and sustainable growth	<ul style="list-style-type: none"> <li>• To co-ordinate the delivery of new infrastructure with development.</li> <li>• To ensure that all development contributes appropriately to local and strategic infrastructure requirements.</li> <li>• To provide a mix of new homes to meet the needs of the population.</li> <li>• To provide for a full range of social, leisure and community facilities and services.</li> <li>• To promote a vibrant and prosperous economy:               <ul style="list-style-type: none"> <li>– To strengthen confidence in Hemel Hempstead’s role as a thriving sub-regional business centre and shopping hub;</li> <li>– To development the Maylands Business Park as a leader of “green enterprise” and focus of the low carbon economy;</li> <li>– To maintain commercial enterprise and employment opportunities in the market towns and large villages; and</li> <li>– To support rural enterprise.</li> </ul> </li> <li>• To ensure the effective use of existing land and previously developed sites.</li> <li>• To promote Hemel Hempstead as the focus of the borough for homes, jobs and strategic services, reinforcing the role of the neighbourhoods in the town.</li> <li>• To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel by car.</li> <li>• To promote healthy and sustainable communities and a high quality of life for Dacorum</li> </ul>
2. Strengthen the role of the	<ul style="list-style-type: none"> <li>• To promote Hemel Hempstead as the</li> </ul>

<p>Maylands Busines Park</p>	<p>focus of the borough for homes, jobs and strategic services, reinforcing the role of the neighbourhoods in the town.</p> <ul style="list-style-type: none"> <li>• To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel by car.</li> <li>• To ensure the effective use of existing land and previously developed sites.</li> <li>• To promote a vibrant and prosperous economy: <ul style="list-style-type: none"> <li>– To develop the Maylands Business Park as a leader of “green enterprise” and focus of the low carbon economy.</li> </ul> </li> <li>• To create safe and attractive environments through high quality design.</li> <li>• To co-ordinate the delivery of new infrastructure with development.</li> <li>• To ensure that all development contributes appropriately to local and strategic infrastructure requirements.</li> </ul>
<p>3. Regenerate Hemel Hempstead town centre</p>	<ul style="list-style-type: none"> <li>• To promote Hemel Hempstead as the focus of the borough for homes, jobs and strategic services, reinforcing the role of the neighbourhoods in the town</li> <li>• To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel by car.</li> <li>• To ensure the effective use of existing land and previously developed sites.</li> <li>• To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel by car.</li> <li>• To ensure the effective use of existing land and previously developed sites.</li> <li>• To promote a vibrant and prosperous economy: <ul style="list-style-type: none"> <li>– To strengthen confidence in Hemel Hempstead’s role as a thriving sub-regional business centre and shopping hub.</li> </ul> </li> <li>• To co-ordinate the delivery of new infrastructure with development.</li> <li>• To ensure that all development</li> </ul>

	contributes appropriately to local and strategic infrastructure requirements.
4. Strong, inclusive communities	<ul style="list-style-type: none"> <li>• To promote healthy and sustainable communities and a high quality of life for Dacorum.</li> <li>• To promote social inclusion and cohesiveness, embrace diversity and reduce inequalities.</li> <li>• To provide a mix of new homes to meet the needs of the population</li> <li>• To provide for a full range of social, leisure and community facilities and services.</li> </ul>
5. A resilient natural environment	<ul style="list-style-type: none"> <li>• To mitigate and adapt to the impacts of climate change</li> <li>• To minimise the effects of pollution on people and the environment</li> <li>• To protect people and property from flooding</li> <li>• To promote the use of renewable resources, reduce carbon emissions, protect natural resources and reduce waste</li> <li>• To protect and enhance Dacorum's distinctive landscape character, open spaces, biological and geological diversity and historic environment</li> <li>• To conserve and enhance the function and character of the market towns, villages and countryside.</li> <li>• To promote a vibrant and prosperous economy: <ul style="list-style-type: none"> <li>- to support rural enterprise.</li> </ul> </li> </ul>
6. A high quality and sustainable built environment	<ul style="list-style-type: none"> <li>• To create safe and attractive environments through high quality design</li> <li>• To mitigate and adapt to the impacts of climate change.</li> <li>• To minimise the effects of pollution on people and the environment</li> <li>• To protect people and property from flooding</li> <li>• To ensure the effective use of existing land and previously developed sites.</li> <li>• To promote the use of renewable resources, reduce carbon emissions, protect natural resources and reduce</li> </ul>

	<p>waste</p> <ul style="list-style-type: none"><li>• To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel by car.</li><li>• To conserve and enhance the function and character of the market towns, villages and countryside.</li></ul>
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\* *incorporating proposed minor change MC6.*