Assessment by Dacorum Borough Council
of its
Pre-Submission Core Strategy

Note:
This checklist has been completed using the template provided by the Planning Inspectorate in April 2012. The format of the checklist has subsequently been amended by the Planning Advisory Service (PAS). On the advice of the Inspector who conducted the Council's NPPF compliance visit, the Council has continued to use the template originally supplied.

June 2012

1A: Achieving sustainable development

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).	*Does the plan positively seek opportunities to meet the development needs of the area?* *Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?* *Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A <u>model policy</u> is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).*	Sustainable Development: • Strategic Objectives set out the key principles that will guide policy decisions and help meet the challenges faced by the Borough. • The Sustainable Development Strategy section – and especially Policies CS1 and CS2 provide a strategic spatial framework for assessment development schemes. • Positivity and flexibility are reflected throughout the Core Strategy. • Policies are expressed positively and seek to deliver the appropriate, balanced level of economic development, homes and other provision in the right places. • Measures to ensure policy	No significant differences identified - the issues the questions raise have been carefully considered. Sustainable development is a 'golden thread' that runs through the entire plan and can only be delivered by the holistic application of policies and proposals within it. This is similar to the Government's view of sustainable development in paras 18-219 of the NPPF. The Council welcomes the fact that the NPPF is intended to act as *"a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities"* (para 1 of the NPPF).

| | | flexibility are summarised in paras 27.11 to 27.14 of the Infrastructure and Delivery section.
 • The Council has made a conscious decision not to have a single policy relating to sustainable development (see para 8.5).

 Development Needs:

 The Core Strategy includes a target of 430 dwellings / year – equating to a total of 10,750 new homes over the plan period. This figure excludes windfalls. If these are added into the equation, then this target is expected to be exceeded by about 6%. The choice of housing target is based on the consideration of a number of factors, including:
 • The amount needed to meet the forecast household growth in the Borough;
 • The ability to deliver a sufficient, flexible and steady housing supply;
 • The opportunities to ensure a mix of housing (both in terms of tenure | The principles of sustainable development are clearly outlined in the Core Strategy, including reference to the five underlying principles of sustainable development (Figure 9), taken from the UK's Sustainable Development Strategy and referred to in the NPPF.

 This approach to sustainable development has the support of the Council's independent sustainability consultant, who has advised that they are satisfied all relevant issues are covered in appropriate sections of the plan.

 A 'model' policy on sustainable development cannot be added at this stage without delaying the Core Strategy's submission to the Secretary of State. However, its inclusion will be considered as a post submission change and advertised as such on the Council's Examination webpage. |

		and type); - Local needs and opportunities, and potential benefits; - The timing of key infrastructure to support new housing; - The balance between jobs and homes; - The support to the local economy and achievement of regeneration targets; - The effect of new developments (i.e. the land used); - The relationship of environmental constraints and impact upon the character of particular settlements; and - The desire to protect the countryside. Further explanation relating to the choice of housing target will be provided in housing paper that will form part of the Council's Submission documents. Policy CS14: Economic Development also states that sufficient land will be allocated to accommodate growth I the economy of approximately	

		10,000 jobs between 2006 and 2031 (the plan period). This level of jobs growth is appropriate to ensure a balance with new homes and support the Council's regeneration objectives.	

The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)		How the Core Strategy accords with the 12 core land use principles is outlined below. The Core Strategy starts with an overview of sustainable development and then addresses economic, social and environmental dimensions of sustainable development, just as the NPPF does. 1. The Core Strategy takes a 'place-based approach' to development and change within the Borough, recognising the different roles played by different towns, large villages and the wider countryside. This is reflected in the 7 Place Strategies in sections 20-26 of the document. These Place Strategies were developed following extensive consultation and engagement with local residents and stakeholders, including a series of Place Workshops (see Volumes 3 and 7 of Report of Consultation). 2. The future of a key regeneration area (the Maylands Business Park) is	No significant issues raised.

to be the subject of a separate Area Action Plan (AAP) produced jointly with the neighbouring authority (St Albans), as there are expected to be some regeneration needs that will impact upon land within their district. There are also regeneration proposals for Hemel Hempstead town centre. These will be set out in a master plan which is due for consultation later in 2012.

3. The strategy takes a positive approach towards growth and regeneration. It identifies a series of Green Belt housing sites (referred to as local allocations) to meet future housing needs and also takes a positive approach to economic regeneration and supporting the economy.

4. Policies CS10-12 promote high quality design, from the scale of the individual settlement down to specific sites. There is also a separate policy (CS13) which seeks to ensure a high quality public realm. Saved policies set out the Council's

		approach to amenity issues such as garden space. These standards will be reviewed and replaced through the Development Management DPD and/or appropriate SPDs.	
		5. The settlement hierarchy (Table 1) recognises the different roles and characters of different parts of the borough. The strategy's 'place-based' approach reinforces the recognition of these differences; with specific visions and local objectives for each town, large village and the wider countryside. The document also includes policies for the Green Belt and Rural Area beyond – recognizing the intrinsic importance of the countryside and putting in place appropriate controls upon development (in accordance with the NPPF). Policy CS24 recognises the particular sensitivity of the Chilterns Area of Outstanding Natural Beauty and the need to control development within this area. The need to support	

		rural enterprise is a strategic objective and its importance to the rural area and overall economy is recognised in Policy CS14- Economic Development.	
		6. The strategy includes specific policies seeking carbon emission reductions (CS28), sustainable design and construction (CS29), the establishment of a sustainability offset fund (CS30), water management (CS31) and ensuring the quality of the air, soil and water (CS32).	
		7. The strategy is to promote the use of brownfield sites before greenfield via the application of Policy CS2. There is specific recognition of the landscape quality of the Chilterns AONB through Policy CS24.	
		8. As above.	
		9. The approach set out towards green infrastructure (Policy CS26 and supporting text) recognises the multifunctional use of land. Mixed use is encouraged through Policy CS4 and paragraph 8.19 of the supporting text.	

		10. Policy CS27 combined with a number of 'saved' policies set out the approach to protection of the historic environment. The saved policies will be reviewed through the development Management DPD. SPD will also be prepared on historic heritage, which will provide support for the Conservation Area Appraisals being prepared. 11. The development hierarchy and policies supporting this (CS1 and CS2) direct development to the most sustainable locations in terms of access to public transport, services and facilities. A specific policy relating to sustainable transport (CS8) supports this approach by strengthening links to and between key facilities. 12. The Core Strategy contains a specific policy relating to social infrastructure (Policy CS23). The Place Strategies identify place-specific needs and how these will be supported and delivered.	

1B: Delivering sustainable development

1. Building a strong, competitive economy (paras 18-22)			
What NPPF expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what NPPF expects**	**Does your local plan address this issue and meet the NPPF's expectations?**	**How significant are any differences?** **Do they affect your overall strategy?**
Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).	*Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)?*	Yes. The Core Strategy is very pro economic growth and regeneration. There are a number of strategic objectives under the heading 'Strengthening Economic Prosperity.' Technical work has considered the viability of all General Employment Areas (GEAs) and considered both long and short term viability. Subsequent DPDs (Site Allocations and East Hemel Hempstead Area Action Plan) will define the GEAs and clarify the appropriate range of uses. This guidance is currently contained within saved policies.	There are no significant differences in approach with the NPPF. The Core Strategy contains a Policy which seeks to promote Economic Development (Policy CS14) and specific policies relating to Office, Research, Industry, Storage and Distribution (Policy CS15) and Shops and Commerce (Policy CS16)

2. Ensuring the vitality of town centres (paras 23-27)			
What NPPF expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what NPPF expects**	**Does your local plan address this issue and meet the NPPF's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
Set out policies for the management and growth of centres over the plan period (23).	*Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?* *Have you identified primary and secondary shopping frontages?*	Yes. Techncial work (in the form of retail studies / assessments) has been undertaken. There have also been separate employment studies which consider the role of the B class uses within town centres. Main and mixed frontages are defined in 'saved' policies and will be reviewed through the Site Allocations DPD. Main frontages equate to the primary frontages referred to in the NPPF and mixed frontages equate to secondary frontages. Policy CS16 (Shops and Commerce) provides a clear framework and sets out the scale, nature and broad location of expected retail growth. A master plan is currently being prepared for Hemel Hempstead Town Centre which will provide	No identified compliance issues.

		further advice and guidance regarding retail issues. This is being informed by a detailed Major Land Use Study and Access and Movement Study.	

3. Supporting a prosperous rural economy (para 28)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).	*Do your policies align with the objectives of para 28?*	The Core Strategy has a specific strategic objective that supports rural enterprise. This is reflected in the Borough Vision and Policy CS14 (Economic Development) and Policy CS23 (Social and Community Facilities). Saved policies also provide further guidance. This advice will be incorporated in subsequent DPDs.	The Council is separately considering whether its approach to tourism can be appropriately amplified. A separate policy statement is possible, but this will not affect the overall strategy.

4. Promoting sustainable transport (paras 29-41)			
What NPPF expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what NPPF expects**	**Does your local plan address this issue and meet the NPPF's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).

Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29). | *If local (car parking) standards have been prepared, are they justified and necessary? (39) (The cancellation of PPG13 removes the maximum standards for major non-residential development set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude lpas from doing so if justified by local circumstances).*

Has it taken into account how this relates to other policies set out elsewhere in the Framework, *particularly in rural areas? (34).*

Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure? | The Borough vision includes references to healthy communities.

Policy CS23 (Social Infrastructure) supports the retention and provision of appropriate social facilities. This includes primary and secondary healthcare. Specific site needs will be considered through the Site Allocations and Area Action Plan DPDs.

Policy CS8 sets out the overarching approach to sustainable transport within the Borough. This gives priority to pedestrians and cyclists, followed by passenger transport, powered two wheelers and lastly, other motor vehicles. Para 9.6 of the supporting text recognises the benefits that choosing sustainable transport choices can have in supporting healthier lifestyles. | None identified. |

		The place based approach adds to this overarching approach; allowing the Core Strategy to identify different transport issues and solutions for different parts of the Borough. Car parking standards are set out in a 'saved' annex to the Dacorum Borough Local Plan. These standards will be reviewed in conjunction with the Development Management DPD. Flexibility is provided by the designation of 'accessibility zones' within the Borough and whether the use is residential or non-residential. Future transport infrastructure needs have been discussed with partner organisations (particularly the local highway authority) throughout the Core Strategy process. A summary of future needs and identified delivery projects is set out within the Council's Infrastructure Delivery Plan (IDP). This reflects the content of the Local Transport Plan and Hemel Hempstead Urban Transport Plan, and the results of detailed traffic modeling.	

		A separate parking strategy and area travel plan have been prepared for the Maylands Business Park (September 2011) Cross-boundary highway issues in Hemel Hempstead have been discussed with St Albans Council and will be progressed further through the jointly prepared East Hemel Hempstead Area Action Plan DPD.	

5. Supporting high quality communications infrastructure (paras 42-46)			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		'Saved' policy on telecommunications in the Dacorum Borough Local Plan. This policy will be reviewed through the Development Management DPD.	

6. Delivering a wide choice of high quality homes (paras 47-55)

What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of *5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land* (47).	*What is your record of housing delivery?* *Have you identified:* a) *five years or more supply of specific deliverable sites;* b) *an additional buffer of 5% (moved forward from later in the plan period), or* c) *If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].* *Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?*	The Hertfordshire Structure Plan dwelling requirement (set out in the Dacorum Borough Local Plan) has been met. The Council has a good record of housing delivery – although the new Core Strategy annual target is a challenging one. The Core Strategy target of 430 dwellings/year does not include any windfall allowance for the first 10 years, in accordance with previous advice in PPS3. The indicative distribution of new homes set out in individual Place Strategies does however include a windfall assumption. The difference between the housing target and overall housing programme is explained further in Table 7 and paragraphs 14.12-14 of the Core Strategy. If windfalls are included the actual level of homes provided is expected to exceed the housing target by	

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	about 6%.	
	The Council's latest Housing Land Availability Paper (July 2011) demonstrates the existence of a deliverable 5 year housing land supply, with additional 5% NPPF requirement. The information in this housing paper is updated annually as part of the Annual Monitoring Report (AMR). The Council has also maintained records on delivery, completions and windfalls for 25 years.	
	A separate housing paper is being prepared to support the Council's Submission Core Strategy. This will provide further detailed information regarding historic windfall rates and the proportion of these that have been provided through garden land.	
	A good knowledge base, the need to protect the Green Belt from unnecessary encroachment and the impact of additional development on infrastructure are good reasons for considering the contribution of windfall to the housing target.	

| Illustrate the expected rate of housing delivery through a trajectory and set out a housing implementation strategy describing how a five year supply will be maintained (47). | *To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?* | A housing trajectory is included as Appendix 2 of the Core Strategy. Local allocations (Green Belt housing sites) will be used in the latter part of the plan period to support housing supply. Policy CS2: Selection of Development Sites gives priority to previously developed land and buildings within defined settlements. No brownfield target is included within the policy, but is being provided as a monitoring indicator once the housing programme is agreed. The removal of national and regional targets doesn't impact on housing land supply. | No identified implications. |
| Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159) | *Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs* | Core Strategy contains policies relating to Housing Mix (Policy CS18) and Affordable Housing (Policy CS19). There are also specific policies relating to provision for Gypsies and Travellers and Rural Sites for Affordable Housing (rural exceptions sites). Affordable housing will be sought on-site above specified thresholds (lower than the old | |

		national minimum threshold), with commuted sums for smaller scale developments. An Affordable Housing SPD is currently being prepared that provides detailed advice regarding all aspects of affordable housing funding and delivery. This is due for public consultation during the summer and to be adopted at the same time as the Core Strategy. Evidence to support the Core Strategy policies is provided by a SHMA and a Development Economic Study, updated by a Housing Needs and Market Assessment Update (final draft May 2012).	
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).	*Have you considered whether your plan needs a policy which allows some market housing to facilitate the provision of significant additional affordable housing to meet local needs?*	Policy CS20 relates to Rural Sites for Affordable Homes and sets out the Council's approach to rural exceptions. Whilst evidence indicates that the overriding demand remains for affordable units on these rural sites, an amendment has been put forward to the text of Policy CS19: Affordable Housing. This clarifies that 100% of all new homes on such sites will *normally* be affordable.	Amendment proposed to Pre-Submission document reflect change in approach in the NPPF.

		This is to reflect the wording in the NPPF and the possibility that a small element of open market housing may be required to facilitate affordable housing delivery. Further advice will be provided in the Affordable Housing SPD.	
	Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)	Yes. Paragraph 10.4 of the Core Strategy already recognises that residential gardens are not always suitable for development. Suitability will be considered in the context of conformity with other policies in the Core Strategy (particularly Policies CS10-12) and the saved SPG on Development in Residential Area. The NPPF gives weight to the Council's approach and the need for a further statutory policy will be considered as part of the development Management DPD.	Issue considered to be sufficiently covered within Core Strategy.
In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	*Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).*	Policies relating to the Distribution of Development, Green Belt (CS5 and 6), Rural Area (CS7) and Rural Sites for Affordable Homes (CS20) seek to ensure housing in rural area	No significant issues relating to compliance identified.

		is located where they will best support the vitality of local communities. The issue of new isolated homes is not considered to merit a specific policy within the Core Strategy. Any proposals will be considered against Policy CS5 (Green Belt), CS7 (Rural Area) and CS24 (Chilterns Area of Outstanding Natural Beauty) and other policies relating to design as appropriate. Consideration can be given to the need for additional policy advice through the Development Management DPD.	
7. Requiring good design (paras 56-68)			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		The Core Strategy contains a number of policies seeking to promote good design (Policies CS10-13).	

8. Promoting healthy communities (paras 69-78)

What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	*Does the plan include a policy or policies addressing community facilities and local services? To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?*	Policy CS23 relates to Social Infrastructure. This policy specifically encourages the dual use of both new and existing facilities. It encourages the provision of new social infrastructure and seeks to protect existing facilities. Local objectives within the individual Place Strategies also seek to ensure local social infrastructure issues are identified and addressed. The specific needs of Hemel Hempstead regarding social infrastructure are covered in Policy CS33 (Hemel Hempstead Town Centre) and will be considered further as part of the Hemel Hempstead Town Centre master plan, which is due to be published for public consultation in the summer. Policy CS1 (Distribution of	No issues relating to compliance identified.

		Development) seeks to direct new development to the most appropriate location to ensure a sustainable pattern of growth. Policy CS8 (Sustainable Transport) seeks to strengthen links to and between key facilities to aid accessibility.	

Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	*Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).*	• Local green spaces are protected through a range of policies and the Council has an adopted Green Space Strategy. • Policy CS26 covers Green Infrastructure. It is a broad framework policy that is supported by more detailed 'saved' policies. • The vision diagrams within the Place Strategies identify key areas of open land that should be retained. • These areas of open land are shown on the Proposals Map and protected by Policy CS4 and saved Local Plan policy. • Reference to, and the identification of, Local Green Space is considered more appropriate within the Site Allocations and/or Development Management DPD. It could also be considered by the planned SPD on Green Infrastructure.	No specific reference to 'Local Green Space.' This is not considered to raise any compliance issues as it is more appropriately referred to in subsequent DPDs or Neighbourhood Plans, if needed.

9. Protecting Green Belt land (paras 79-92)

What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82) Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83). Boundaries should be set using 'physical features likely to be permanent' *amongst other things* (85)	If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy? For example: Lpas should plan positively to enhance the beneficial use of the Green Belt. *Beneficial uses are listed in para 81.* PPG2 set out that 'Green Belts have a positive role to play in fulfilling objectives. Para 1.6 of PPG2 set out the objectives – some of these have been rephrased/ amended and 'to retain land in agricultural, forestry and related uses' has been omitted. Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85).	A number of amendments have been made to the original Pre-Submission policy on Green Belts to reflect the wording of the NPPF. This includes reference to 'buildings' rather than 'dwellings'. Amended policy is as follows (new text shown as underlined, deleted text is struck through): ***Policy CS5: Green Belt*** *The ~~strict application of~~ Council will apply national Green Belt policy ~~which permits appropriate development will be used~~ to protect the openness and character of the Green Belt, local distinctiveness and the physical separation of settlements.* *There will be no general review of the Green Belt boundary, although local allocations (under Policies CS2 and CS3) will be permitted.* *Within the Green Belt, small-scale*	Potential compliance issues are considered to have been resolved through proposed amendments to the Pre-Submission policies relating to the Green Belt policy (and Rural Area policy for consistency).

development will be permitted: *i.e.*

Does it allow for the extension or alteration of a *building,* provided that it does not result in disproportionate additions over and above the size of the original building? (89). *PPG2 previously referred to dwelling. Original building is defined in the Glossary.*

(a) building *for the uses defined as appropriate in national policy;*

(b) ~~for~~ *the replacement of existing buildings for the same use;* ~~existing houses (on a like for like basis); and~~

(c) ~~for~~ *limited extensions to existing buildings;*

Does it allow for the replacement of *a building, provided the new building is in the same use and not materially larger than the one it replaces? (89) PPG2 did not have a separate bullet point – replacement related to dwellings rather than buildings.*

(d) *the appropriate reuse of permanent, substantial buildings; and*

(e) *the redevelopment of previously developed sites[14], including major developed sites which will be defined on the Proposals Map*

Does it allow for limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development? (89)
(PPG2 referred to 'major existing developed sites')

provided that:

i. ~~there is~~ *it has* ~~no~~ *significant impact on the character and appearance of the countryside; and*

ii. ~~if relevant, the development will~~ *it*

	Change from 'Park and Ride' in PPG2 to *local transport infrastructure* and the inclusion of *'development brought forward under a Community Right to Build Order'* in relation to other forms of development that are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. (90).	*supports the rural economy and maintenance of the wider countryside.* *Further guidance will be provided.* ~~*No general review of the Green Belt boundary is proposed, although local allocations (under Policies CS2 and CS3) 2will be permitted).*~~ *Development within selected small villages in the Green Belt will be permitted in accordance with Policy CS6.* ~~*Proposals for designated Major Developed Sites will be determined in the context of national Green Belt policy.*~~ *Footnote: [14] Excluding temporary buildings*	

10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)			
What NPPF expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what NPPF expects**	**Does your local plan address this issue and meet the NPPF's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).	*Have you planned new development in locations and ways which reduce greenhouse gas emissions?* *Does your plan actively support energy efficiency improvements to existing buildings?* *When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)*	Policies CS1 (Distribution of Development) and CS2 (Selection of Development Sites) seek to locate new development in the most sustainable locations. Policy CS29 considers sustainability issues thoroughly in relation to design and construction (including energy efficiency) and Policy CS31 in relation to water management issues. The issue of water supply is considered further within the Infrastructure Delivery Plan (IDP).	No compliance issues identified.
Help increase the use and supply of renewable and low carbon energy (97).	*Do you have a positive strategy to promote energy from renewable and low carbon sources?* *Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the*	This is a key element of the Core Strategy. Policy CS28 relates to Carbon Emission Reductions, CS29 sets out expectations regarding sustainable design and construction and CS30 makes provision for the establishment of sustainability offset fund.	No compliance issues identified.

| | *development of such sources (see also NPPF footnote 17)* | The Core Strategy includes an Energy Opportunities Plan (Map 4). This illustrates the opportunities for wind turbines and district heating. Further guidance will be included within SPD and within the Development Management DPD.

The policy approach is supported by the use of the CPlan carbon compliance check and monitoring tool in development management. | |

11. Conserving and enhancing the natural environment (paras 109-125)			
What NPPF expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what NPPF expects**	**Does your local plan address this issue and meet the NPPF's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
Planning policies should minimise impacts on biodiversity and geodiversity (para 117). Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).	*If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?*	Biodiversity and geodiversity issues are covered by: • Policy CS26 (Green Infrastructure) and paragraphs 16.17-16.24 of the supporting text; • Policy CS24 (The Chilterns Area of Outstanding Natural Beauty) • Policy CS25 (Landscape Character), which is supported by a Landscape Character Assessment for the Borough • Policy CS27 (Quality of the Historic Environment) • a number of 'saved' policies. The approach in the Core Strategy is underpinned by a number of technical studies. Whilst some are at district level, the Hertfordshire Green	No significant difference.

	Infrastructure Plan ('Green Infrastructure in Hertfordshire – a Framework') provides a county level perspective. The Landscape Character Assessment considers links across the borough boundary and links with studies for adjoining districts (where available). Specific Nature Improvement Areas have not been identified within the Core Strategy. The strategy does however identify 'areas of biodiversity opportunity.' These are locations where investment and management could secure significant habitat and wildlife benefits. A minor change to the Core Strategy recognises landscape-scale biodiversity issues more readily. In Hertfordshire, a Living Landscapes project may provide the key initiative.	

12. Conserving and enhancing the historic environment (paras 126 – 141)			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		Covered by Policy CS27 (Quality of the Historic Environment) and associated 'saved' policies.	

13. Facilitating the sustainable use of minerals (paras 142-149)

What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).	*Does the plan have policies for the selection of sites for future peat extraction? (143) (NPPF removes the requirement to have a criteria based policy as peat extraction is not supported nationally over the longer term).*	Detailed policies are contained within the County Council's Minerals and Waste Development Framework, to which the Core Strategy refers (paragraph 18.40). None of the housing sites identified in the Core Strategy are in locations where mineral resources have been identified.	No compliance issues identified.

Planning policy for traveller sites

The CLG 'Planning policy for traveller sites' was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled.   'Planning policy for travellers sites' should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

> 'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers which respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (lpas) make their own assessment of need for the purposes of planning
- That lpas work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green Belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy A: Using evidence to plan positively and manage development (para 6)			
What the policy for traveller sites expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what the policy expects**	**Does your local plan meet the policy's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
Early and effective community engagement with both settled and traveller communities.	Has your evidence been developed having undertaken early and effective engagement including discussing travellers accommodation needs with travellers themselves, their representative bodies and local support groups?	Technical evidence used to inform the Core Strategy comprises the following: • Gyspy and Traveller Study – Accommodation Needs (Stage 1) (2005) • Gypsy and Traveller Study – Potential Sites (2007) Both studies were conducted jointly with neighbouring planning authorities within Hertfordshire. Discussions are underway with neighbouring authorities in Hertfordshire to review and update these studies. The Council has also had regard to information and policy development through the regional planning process. The figures included within Table 10 are based on the revision to the Regional Spatial Strategy (July 2009) as this provides the	No compliance issues identified.

| | | most up-to-date assessment of need.

Groups representing the Gypsy and Traveller community have been contacted at each stage of consultation on the Core Strategy. Specific consultation with the local Gypsy and Traveller community was also carried out by specialist consultants on behalf of the Council. This took the form of face-to-face interviews to ascertain their needs and aspirations. The feedback received helped inform the Council's approach in paras 14.41-14.45 and the content of Policy CS22 (New Accommodation for Gypsies and Travellers). See Report of Consultation and the Consultation Report for the Site Allocations Issues and Options 2008 for further information. | |

Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	Can you demonstrate that you have a clear understanding of the needs of the traveller community over the lifespan of your development plan? Have you worked collaboratively with neighbouring local planning authorities? Have you used a robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions?	See above.	No compliance issues identified.

Policy B: Planning for traveller sites (paras 7-11)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring lpas (8)	Have you identified, and do you update annually, a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set targets? Have you identified a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. (9)	The supply of sites is updated annually as part of the Council's Annual Monitoring Report process. Policy CS22 sets out the Council's approach which is to seek provision as part of the local allocations (housing sites planned for release from the Green Belt). These and other sites will be identified through the Site Allocations DPD. There could be ad-hoc provision in addition. Estimated requirements are set out in Table 10. A target of 59 additional new pitches is specified. For travelling showpeople, the aim is to retain existing sites.	

Consider the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites.	Have you identified constraints within your local area which prevent you from allocating sufficient sites to meet likely future need? If so have you prepared a joint development plan or do you intend to do so? Is the reason for this clearly explained?	The Council intends that its own level of need should be met. The Council will review the needs assessment through jointly commissioned work with adjoining authorities in the same way it will update other technical advice. Whilst cross-authority liaison will continue, the likelihood of a joint development plan on travellers is considered remote.	
Relate the number of pitches and plots to the circumstances of the specific size and location of the site and the surrounding population size and density.		Yes.	
Protect local amenity and environment.		Yes.	

Set criteria to guide land supply allocations where there is identified need.	Has an up-to-date assessment of the need for traveller sites been carried out? If an unmet need has been demonstrated has a supply of specific, deliverable sites been identified based on the criteria you have set? Where there is no identified need, have criteria been included in case applications nevertheless come forward?	Yes. See above.	
Ensure that traveller sites are sustainable economically, socially and environmentally.	Have your policies been developed taking into account criteria a-h of para 11 of the policy	Yes.	

Policy C: Sites in rural areas and the countryside (para 12)			
What the policy for traveller sites expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what the policy expects**	**Does your local plan meet the policy's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
When assessing the suitability of sites in rural or semi-rural settings lpas should ensure that the scale of such sites do not dominate the nearest settled community?		Yes. Criterion (a) of Policy CS22 requires sites to be distributed in a dispersed patterns around settlements. This is intended to avoid an over-concentration of provision in any one location and avoid dominating the settled community.	

Policy D: Rural exception sites (para 13)			
What the policy for traveller sites expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what the policy expects**	**Does your local plan meet the policy's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
If there is a lack of affordable land to meet local traveller needs, lpas in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.	If you have a lack of affordable land to meet local traveller needs in your rural area have you used a rural exception site policy, and if so, does it make it clear that such sites shall be used for affordable traveller sites in perpetuity?	Policies CS21 and CS22 provide the lead. Policy CS20 does not preclude sites being for Gyspy and Traveller pitches, where these would provide local affordable homes. It is the expectation that any units provided under this policy would remain in affordable use in perpetuity. Further advice will be provided in the Affordable Housing SPD which is due for consultation this summer.	

Policy E: Traveller sites in Green Belt (paras 14-15)			
What the policy for traveller sites expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what the policy expects**	**Does your local plan meet the policy's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.	Have you made an exceptional limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site? Has this alteration been done through the plan-making process and is it specifically allocated in the development plan as a traveller site only	Policy CS22 states that 'priority will be given to the provision of sites which are identified on the Proposals Map.' This is expected to include provision as part of the local allocations. These are sites that are currently in the Green Belt but will be removed from this designation through the Site Allocations DPD, when their detailed site boundaries are agreed.

There are currently no proposals in the Core Strategy to remove sites from the Green Belt solely for the allocation of traveller sites. This can be considered as part of the Site Allocations DPD. | |

Policy F: Mixed planning use traveller sites (paras 16-18)			
What the policy for traveller sites expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what the policy expects**	**Does your local plan meet the policy's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
	Have you considered including travellers sites suitable for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents)? If mixed sites are not practicable have you considered the scope for identifying separate sites for residential and for business purposes in close proximity to one another? Have you had regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment? **NB Mixed use should not be permitted on rural exception sites**	Policy CS4 (The Towns and Larger Villages) supports mixed use development where it supports the principles of sustainable development and does not conflict with other policies. This issue of mixed use travellers sites can be considered further on a site by site basis through the Site Allocations DPD. There is no identified need for additional provision for Travelling Showpeople within the borough.	

Policy G: Major development projects (para 19)			
What the policy for traveller sites expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what the policy expects**	**Does your local plan meet the policy's expectations?**	**How significant are any differences? Do they affect your overall strategy?**
	Do you have a major development proposal which requires the permanent or temporary relocation of a traveller site? If so has a site or sites suitable for the relocation of the community been identified (if the original site is authorised)?	N/A	

Plan-making

Local Plans (paras 150-157)			
What NPPF identifies in relation to the development of local plans	**Questions to help understand whether your local plan includes what NPPF expects**	**Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)**	**Does your local plan meet the NPPF's expectations? How significant are any differences?**
Each local planning authority should produce a Local Plan for its area. Any additional DPDs should only be used where clearly justified. SPDs should be used where they help applicants make successful applications/aid infrastructure delivery/not be used to add unnecessarily to financial burdens on development (153)	*Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?*	The structure of Dacorum's Local Planning Framework is set out in Figure 1.

The Core Strategy seeks to make the key strategic decisions, such as the level of new development and the broad distribution of this. More detailed and site specific policies will follow in three other DPDs (Site Allocations, Development Management and East Hemel Hempstead Area Action Plan)

This is considered the best approach to meeting the development needs of the Borough. When considering the most appropriate structure for the development plan, consideration has also be given to the fact that the Core Strategy is at an advanced stage | |

		and issues and options consultation has been carried out for two of the three other DPDs. It is therefore considered preferable for the Council, its partners, local residents and the development industry to continue within this framework, rather than delay progress whilst existing policies are moulded into a different structure and new policies developed and consulted upon. Whilst a series of SPDs are programmed, these are intended to provide additional advice and guidance that assists the development industry, rather than add additional constraints and costs to development.	
Local Plans should: • Plan positively (para 157)	*Have you objectively assessed development needs and planned for them?* *If you can't meet them in your area, have you co-operated with others on meeting them elsewhere? (para 182)*	Development needs have been objectively assessed and the strategy seeks to meet these whilst taking into account constraints within the Borough (i.e. constraints posed by both designations such as Green Belt and the Chilterns AONB and infrastructure constraints). A statement under the 'Duty to Co-operate' is being prepared as	

		part of the submission documents. The Area Action Plan proposed for East Hemel Hempstead will be jointly prepared with St Albans District Council in recognition of the cross-boundary issues raised.	

Using a proportionate evidence base (paras 158-177)			
What NPPF identifies in relation to the development of local plans	**Questions to help understand whether your local plan includes what NPPF expects**	**Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)**	**Does your local plan meet the NPPF's expectations? How significant are any differences?**
Defence, national security, counter-terrorism and resilience	See para 163	Not explicitly covered. The Council has consulted relevant organisations, including Ministry of Defence, utilities, Health and Safety Executive, Environment Agency and Luton Airport Operators Ltd, and included any relevant points.	Not considered to be a significant non-conformity issues.
Ensuring viability and deliverability The sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (173)	*To what extent has your plan been assessed to ensure viability, taking into account the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements?* *In so doing to what extent has it taken into account the normal cost of development and on-site mitigation and provide competitive returns to a willing land owner and willing developer*	The Council has tested viability of affordable housing requirements on housing development through a Development Economics Study carried out by Three Dragons. Development costs (related to s106, Code for Sustainable Homes etc) have also been considered by consultants preparing a viability report on the Community Infrastructure Levy (CIL) for the Council. They have concluded that a CIL payment is still viable for most	No conformity issues raised.

	to enable the development to be deliverable (173)?	types of development in addition to these other costs. The differential costs of different scales of development, as well as values, have been considered. CIL and affordable housing (financial) contributions are expected to be graduated. The approach to sustainable design is similarly considered, so as to ensure small scale development remains viable and attractive. Where relevant, policies contain clear caveats regarding viability. The overarching approach to seeking developer contributions is set out in Section 28 of the Core Strategy. Proposals for the local allocations (housing sites currently within the Green Belt) have evolved following discussions with landowners. They have not raised any viability concerns relating to these proposals. Separate viability work will accompany the Hemel Hempstead Town Centre Master Plan.	

	To what extent have the likely cumulative impacts on development in your area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards been assessed to ensure that the cumulative impact of these standards and policies do not put implementation of the development plan at serious risk, and facilitate development throughout the economic cycle (174)?	Cumulative impacts have been assessed and will continue to be assessed. See above.	

Examining Local Plans (para 182)			
What NPPF identifies in relation to the development of local plans	**Questions to help understand whether your local plan includes what NPPF expects**	**Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)**	**Does your local plan meet the NPPF's expectations? How significant are any differences?**
Authorities should submit a plan for examination which it considers is sound, including being ….	*Positively prepared*	See response to para 157 above and the statement under the 'duty to co-operate' that will accompany the submission Core Strategy.	No significant issues raised.