



Dacorum Borough Council

Local Planning Framework

DACORUM SITE ALLOCATIONS DPD EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Matter 2: General Matters

September 2016

Purpose of this statement

The purpose of this statement is to summarise the Council's position regarding the following matters, issues and questions 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 and the Council's response

Changes Modifications

1. Are the Council proposing any Main Modifications, in addition to the focused changes that are being considered as part of this examination?

- 1.1 On 25 February 2016 a letter was formally submitted under Section 20 (7C) of the Planning and Compulsory Purchase Act 2004, formally requesting the Inspector to recommend any necessary Main Modifications to the submitted Site Allocations DPD that she considered were required to make the plan 'sound.'
- 1.2 The Council has not currently proposed any Main Modifications to the Site Allocations DPD (Examination Document SUB1), beyond those included in the Focused Changes process and incorporated into the submitted plan. Some Minor Changes are however proposed (see response to Question 2 below).
- 1.3 Whilst up until now no Main Modifications have been tabled, as a result of some of the questions now raised by the Inspector, the Council would like to take the opportunity to put some modifications forward for consideration. These are set out in an Appendix to this document. Appendix 1 sets out what the Council considers to be the Main Modifications and Appendix 2 the Minor Modifications.
- 1.4 The Council has previously used the following approach to distinguish between Main Modifications and Minor Changes:

Minor Change	Changes of a minor nature that do not affect the overall strategy or the intent of the policies and proposals it contains.
Main Modification ¹	Changes of a more significant nature that usually relate to the inclusion of a new proposal site, a more substantial change to the wording or boundary of a designation or proposal, or impacts on the interpretation of policy.

- 1.5 This schedule will be placed on the examination webpage and updated as necessary.

2. Are any further ones likely to be advanced during the examination? Is there a separate schedule of Minor Changes?

- 2.1 It is not yet known if the need for any further Main Modifications will arise through the remainder of the examination process, but the Council will be guided by the Inspector on this matter and make any required additions to the existing schedule.
- 2.2 In addition to the Main Modifications, there are also some Minor Changes that the Council wishes to make to the submitted plan to address some of the representations received to the Focused Changes process. This list was

¹ Referred to as a 'Significant Change' with regard to the Focused Changes process.

referred to in the Council's formal submission letter, and also in the response to previous procedural correspondence (Document PC2a). The changes themselves are set out in the 'Schedule of Changes proposed in response to Representations on the Focused changes' (Examination Document SUB3) and included here as Appendix 2. All changes are considered to fall within the definition of Minor Changes i.e. they do not have a significant impact upon the way a policy or proposal is interpreted, rather they add clarity to an existing approach (see definitions in response to Question 1 above).

- 2.3 The Minor Changes that emerged through the Focused Changes process have not been subject to consultation, but have been subject to Sustainability Appraisal (Examination Document SUB5).
- 2.4 Any further Minor Changes that the Council or Inspector wishes to suggest as the examination progresses will be added to this schedule.
- 2.5 This schedule will be placed on the examination webpage.

Coverage and approach

3. Where is the Council up to with the partial early review of the CS? What are the anticipated timescales between now and examination of that Plan?

- 3.1 The Council is currently in the 'information gathering' stage of the review process of its new Local Plan. This document will take the form of a single Local Plan, incorporating the early partial review of the Core Strategy.
- 3.2 It is acknowledged that the latest Local Development Scheme (LDS) timetable (Examination Document SUB7) envisaged Issues and Options consultation for this new Local Plan in late summer / early Autumn 2016. However, due to slippage in the Site Allocations timetable, and some technical work taking longer than expected to complete, this process has been delayed by approximately 6-8 months. A new LDS timetable will be prepared and agreed by Cabinet as part of the Authority Monitoring Report (AMR) process in November / December 2016. This is expected to extend the anticipated adoption date for the new Plan to late 2018, to reflect the delay in Issues and Options consultation and the inclusion of a draft plan stage to enable key policies to be tested prior to the formal publication of the plan.
- 3.3 To inform this new Local Plan, the Council has prepared, or is in the process or preparing the following technical studies:

Completed:

- SHLAA (incorporating a 'Call for Sites') (April 2016).
- GB Stage 1 (prepared in conjunction with St Albans and Welwyn Hatfield Councils) (November 2013).

- Stage 2 Green Belt Review and Landscape Appraisal (January 2016).
- SHMA (prepared in conjunction with Three Rivers, Hertsmere and Watford Council and also covers St Albans administrative area) (January 2016).
- Economy Study (prepared in conjunction with Three Rivers, Hertsmere and Watford Council and also covers St Albans administrative area) (January 2016).

3.4 All published documents² are available on the Council's new Local Plan webpage: <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

In Progress:

- Employment Land Availability Assessment (due for completion early Autumn)
- Water Study (with other Herts Authorities, the EA and water companies to look at waste and potable water) (see response to Question 9 below for information on progress).
- Car parking standards (tender brief being drawn up in consultation with local highway authority. Study to potentially be carried out in partnership with other authorities in south west Hertfordshire) (due for completion Spring 2017).
- Two Waters Study (to look at potential for urban intensification in this part of Hemel Hempstead) (due for completion end of 2016).
- Settlement Hierarchy Study (looking at current hierarchy, if this is fit for purpose, plus current and future infrastructure capacities and challenges. Will also supersede the current Social and Community Facilities Study).
- Infrastructure Delivery Plan – 2016 update (due for completion Autumn 2016).
- Open Space Study (due for completion Autumn 2016).
- Hertfordshire Vision and Local Transport Plan (LTP4) (to address changes since LTP3 was adopted in 2011 and highlight major transport schemes)
- South West Hertfordshire Growth and Transport Plan (gathering information on movements between the key towns and settlements in the M1, M25 and A41 corridor) (due for completion early 2017)

3.5 Further work has been identified with updates to the Retail Study required and a new Gypsy and Traveller Needs assessment. The Retail Study is programmed to be updated once there is further clarity on growth levels and its spatial distribution. The a new Gypsy and Traveller Needs assessment will be commissioned in 2017.

² Please note that the GB Stage 2 Report is due to be published later in 2017, alongside the Settlement Hierarchy Study.

The Council will also make use of the county-wide Transport Model (COMET) and the Hemel Hempstead Urban Transport (Paramics) Model to identify and test levels of new growth and options for distributing strategic growth.

- 3.6 An internal Officer working group has been established to take forward the review of existing 'saved' development management policies. Senior managers have also been briefed on the outcome of technical studies and PAS are advising as a 'critical friend' for the plan review process. A Member Task and Finish Group has also been established to ensure Member views are fully reflected in the plan preparation process. This group is expected to begin regular meetings once the Site Allocations hearings have closed.
- 3.7 Dacorum Council is also involved in preparing a masterplan with St Alban City and District Council and the Crown Estate for the Gorhambury land directly to the east of Hemel Hempstead. This land was due to form part of the East Hemel Hempstead Area Action Plan (AAP) to be prepared jointly by both authorities. However work on the AAP has not progressed due to unresolved issues between the two councils regarding whose homes and jobs targets the new development should count towards. This matter is currently before the Inspector appointed to examine the St Albans Strategic Local Plan (Mr David Hogger).

4. Why does this Plan not contain its own monitoring framework? Should it?

- 4.1 Chapter 18 of the Site Allocations DPD (Examination Document (SUB1) explains the Council's approach to monitoring:

The Monitoring Framework

- 18.2 The Core Strategy has put an extensive monitoring framework and delivery strategy in place. This includes a comprehensive list of monitoring indicators and targets. Policies and proposals within the Site Allocations document will be assessed against these indicators and targets. No additional indicators or targets are proposed.
- 18.3 The Council produces a regular monitoring report, known as the Annual Monitoring Report (AMR), containing information on a range of issues, including the implementation and performance of planning policies. The information in Dacorum's AMR will be used to monitor the delivery of the site specific proposals, associated targets and phasing. The AMR will also be used when assessing the effectiveness of individual policies and approaches, and will help inform the forthcoming plan review (see below).
- 18.4 The AMR is informed by housing and employment land position statements which set out detailed information on permissions, starts and completions. These statements include data on both large sites (i.e. those allocated within the Schedules of Proposals and Sites), smaller sites that fall below size thresholds identified in the Sites Allocation document and other future (windfall) development.

4.2 As explained above, the Council does not consider that polices within the Site Allocations DPD generate the need for any additional monitoring indicators above those already set out in the Core Strategy.

4.3 In coming to this conclusion it has looked at how other authorities have approached this issue for comparison. Whilst Hertsmere Council's recently examined Site Allocations and Development Management Polices DPD does contain additional monitoring indicators, these are limited in number and for the Site Allocations element of the document only really refer to 'delivery of proposal' or 'delivery of proposals.' As site delivery against specified targets is already covered by relevant Core Strategy indicators, and is also covered by the annual Residential Land Position Statement, Employment Land Position Statement and AMR processes, such a general indicator seems unnecessary.

4.4 Three River's Site Allocations DPD (adopted in November 2014) takes almost the same approach as Dacorum. There is a short section on monitoring, which includes the following:

12.3 The purpose of the Site Allocations document is to deliver the Core Strategy. The Core Strategy has an extensive monitoring framework to assess the delivery of policies, and the Site Allocations document will be monitored against the monitoring indicators in the Core Strategy including those around housing delivery and employment and town centre floorspace completions.

12.4 In addition, progress on individual sites will be monitored against capacity and phasing information set out in the Site Allocations document.

4.5 It does also include a short policy on monitoring and delivery:

POLICY SA9: MONITORING AND DELIVERY
The Council will work with a range of partners such as landowners, the Local Strategic Partnership, infrastructure and service providers and environmental bodies and interest groups to deliver development on allocated sites.
Regular monitoring will assess progress on individual sites against capacity and phasing information set out in the Site Allocations document.

4.6 As this is only a statement of intent, and reflects what is already set out in the text of both Dacorum's Core Strategy and Site Allocations, and repeats what Councils are already required to do, the inclusion of such a policy is considered to add little to the robustness of the plan.

4.7 Whilst the Council is therefore of the view that any further monitoring targets or a monitoring policy are not necessary to add to Dacorum's submitted Site Allocations plan, it is happy to discuss this issue further at the hearings, should the Inspector consider that any soundness issues are raised by the Council's current approach.

5. What alternatives to the sites in the Plan have been considered?

- 5.1 In responding to this question, the Council has assumed that the Inspector is referring to alternative housing sites (including those for Gypsies and Travellers) that have been considered through the plan-making process.
- 5.2 It was the role of the Core Strategy process to consider the merits of a range of Green Belt sites that could have provided alternatives to the six Local Allocation sites ultimately chosen for inclusion in the plan. This process of site selection is set out in the 'Assessment of Alternative Local Allocations and Strategic Sites' (Examination Document HG5), with options being narrowed down as the plan progressed through its various consultation stages. These decisions reflected the role each place played within the settlement hierarchy (informed by the function and character of each place), together with consideration of relevant technical work looking at site opportunities and constraints.
- 5.3 Key consultation stages in terms of considering strategic site options were the Growth at Hemel Hempstead Supplementary Issues and Options consultation (November 2006) (Examination Document CS34) and the Emerging Core Strategy (Examination Document CS31). The option(s) taken forward for each settlement were informed by feedback from these consultations, together with the view expressed at a series of 'Place Workshops', and through the Council's Citizens Panel. A summary of these consultations is contained in Volume 7 of the Core Strategy Consultation Report, with detailed information in the preceding volumes (Examination Documents CS19).
- 5.4 Both strategic and non-strategic site options were further considered through the Schedules of Site Appraisals prepared to inform the Site Allocations DPD (Examination Documents SA13, SA19 and SA20). These schedules were updated as new sites were put forward through the development of the Site Allocations DPD. Through this 'site sieving' process the Council dismissed a large number of sites that could not be considered as 'reasonable alternatives' due to a range of 'exclusionary criteria' (e.g. location in the Green Belt or in flood zone) and hence ensured site selection reflected decisions already taken on the quantum and location of development by the Core Strategy.
- 5.5 In terms of non-strategic site alternatives, these are very limited in number. Procedural Document PC2a set out a list of sites that had been promoted at the Pre-Submission stage, but were not included in the submitted version of the plan. These are listed in Table 1 below (with any necessary updates), together with a summary of why they were not included in the submitted Site Allocations DPD. Maps showing the locations of these sites are provided in Appendix 3 to document this document. It should be noted that:
- not all locations put forward were site-specific;
 - some would potentially fall below the site size threshold for allocation (e.g. of 10 or more units); and
 - a number of sites have subsequently benefited from planning permission

or are the subject of current planning applications.

Table 1:

Non- Strategic Housing Sites not taken forward through the Site Allocations DPD

Notes:

- Table includes some submissions requesting change to Green Belt boundaries where it is clear that the reasons for these changes are to enable further residential development.
- ID number relates to that of the Agent ID unless no agent was used, when it relates to the Person ID.

Ref	Location	ID no.	Stated Capacity	Comments
1. Housing Sites				
Berkhamsted:				
OM1	Land South of Ashylins School, Chesham Road	372732	5-8	5 homes allowed on appeal (4/0310/15/OUT).
OM2	Castle Gateway	868572	1	Single eco home being promoted.
OM3	Blegberry Gardens	874750	-	
OM4	Land at Rose Cottage, 17 Bank Mill Lane	503097	16	Subject to application for 19 flats (4/2820/15/MOA).
OM5	Ivy House Lane	619659	-	
OM6	Land east of New Road	865538	-	Includes proposal for additional parking to serve the town centre.
OM7	Land at Denny's Lane (Haslam Fields)	868870	-	
Hemel Hempstead:				
OM8	St Mary's Convent, Green End Road	875695	-	Subject to application for 21 homes (4/0493/16/FUL).
Tring:				
OM9	Land at Marshcroft Lane / Station Road	868800	-	
OM10	Land at Waterside, Icknield Way	210986	-	
OM11	Akeman Street GEA	865117	-	
Bovingdon:				
OM12	Chilterns Jaguar Garage (Hardings Garage, Chesham Road)	871184	-	Application approved for 34 retirement apartments (4/3698/15/MFA). Also promoted through Focused Changes

				consultation, although not specific to any proposed changes.
OM13	Land to r/o Green Lane / Homefield	875690	130-175	
Kings Langley:				
OM14	Land at Love Lane	619659	4-8	Subject to application for 4 homes (4/2147/16/OUT). Also promoted through Focused Changes consultation, although not specific to any proposed changes.
Other locations:				
OM15	Land adjoining Dixons Wharf, Wilstone	868581	40	Also promoted through Focused Changes consultation, although not specific to any proposed changes.
OM16	Button House, Pix Farm Lane, Bourne End	864666	-	
2. Traveller Sites:				
OM17	The former household waste site in Tringford Road, Tring.	865009 and 869019 and 865009	-	The Tringford Road site is no longer available as it is to be used for the replacement Council depot (the existing site in the town is to be redeveloped for housing).
OM18	Bovingdon Airfield	869006	-	Not site specific.
OM19	Berkhamsted	869016	-	Not site specific.

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

5.7 See also response to Matter 1, Question 4.

6. Is it clear from the Plan what supplementary planning documents are to be prepared? What are they, their status and purpose, and what is the programme for their preparation? Are important decisions that should be made in the Plan being delegated to these documents?

- 6.1 The Council's Local Development Scheme (Examination Document SUB7), adopted in January 2016 provides information on the supplementary planning documents that are to be prepared as part of the Council's Local Development Framework. These are as follows:
- Vehicle Parking Standards
 - Urban Design
 - Historic Heritage
 - Renewable Energy.
- 6.2 It is recognised that the legal duty to provide such information was removed through the 2008 Planning Act. However, the Council considers that it is helpful information to share with the community, so continues to provide this.
- 6.3 All four of the proposed SPDs are considered to have a development management focus and are primarily required to support an update to Development Management (DM) policies. It is therefore not necessary to refer to them in the Site Allocations. As explained in both the LDS and the introductory section of the Site Allocations document, these DM policies will no longer be included within a separate DPD, but will be reviewed and updated as part of the new single Local Plan for the Borough. Their production will therefore logically occur in parallel, or immediately after this plan is adopted. Work is currently underway on preparing the tender specification for the Vehicle Parking Standards SPD, with a view to appointing consultants this autumn. Work to scope out the content of the Urban Design SPD has already begun, with the potential to bring forward specific guidance on tall buildings in advance of the main document being considered, in order to allow the Council to react proactively to future planning applications.
- 6.4 The master plans being prepared for each of the Local Allocations sites are not included in the LDS list as they are not anticipated to be adopted as SPD. Rather the intent is for them to form supplementary planning guidance to elaborate on the requirements set out in Policies LA1-6 of the Site Allocations DPD. In reality, the distinction between that the Council terms SPG and SPDs is very narrow and the terms are almost interchangeable. The main distinction is that SPDs may require a sustainability appraisal, whilst SPGs would not. In the case of the Local Allocations master plans, SA/SEA is not considered necessary, as the sites have already been appraised through the Site Allocations process itself.
- 6.5 These master plans are appropriately and clearly referred to in the Site Allocations document:
1. Policy SA8: Local Allocations refers to the fact that *'Site master plans will provide further guidance regarding detailed layout and design.'*
 2. Each LA Policy includes reference to *'Further detail is contained in a site master plan'* (or similar).

3. Paragraph 6.24 states that *‘.....These policies are supported by site master plans which will help guide the form, timing and principles of development in each case.’*

6.6 It is the Council’s intention to make any amendments necessary to the Local Allocations master plans following the conclusion of the Site Allocations process and adopt them at the same time as the DPD. This will ensure that both the requirements of the DPD and master plans are fully aligned.

6.7 In the light of the above, the Council does not consider there are any important decisions that should be made within the Site Allocations DPD which have been delegated to supplementary planning documents.

7. Are policies flexible enough?

7.1 The Council considers that the policies within the Site Allocations DPD are written so as to offer the right degree of flexibility versus certainty for all with an interest in the future planning of the Borough.

7.2 For example, Policy SA8: Local Allocations allows for the land to be used in accordance with Open Land (Policy CS4: Towns and Large Villages); and / or temporary uses which do not prejudice their delivery for their allocated use. Similarly, the indicative spatial layouts contained within each Local Allocation policy (Policies LA1-LA6), reflect discussions and feedback from landowners / developers, local residents and other interested parties. Whilst they, and the wider policy requirements, set some basic principles which should be followed, they are not so prescriptive that they risk stifling good urban design and innovation.

7.3 In other instances, policies within the Site Allocations DPD reflect a more inclusive approach to development and changes of use than in the current ‘saved policies’ of the Dacorum Borough Local Plan 1991-2011. Examples include the approach to and definition of, shopping areas in town centres (Policy SA7) and the inclusion of a schedule of Mixed Use Proposals within the plan, where the precise mix of different types of development is intentionally left flexible.

7.4 The text in section 27 of the Core Strategy explicitly relating to ‘Flexibility and Contingency’ also applies to the Site Allocations that delivers the Core Strategy policies. This text acknowledges the need for flexibility within planning policies and sets out how this has been built in to the policy approach.

8. Has the Plan had regard to heritage assets, including the statutory test set out in S66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990?

8.1 The Site Allocations DPD has had appropriate regard to heritage assets, including the statutory test to which the Inspector refers. This states the following:

66.—(1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- 8.2 Where sites may be considered to have an impact upon Listed Buildings or their settings (i.e. LA1, LA5 and Site MDS2 at Berkhamsted Castle Village), policies and proposals pertaining to these sites include appropriate safeguards to ensure that any impact can be minimised at the planning application stage. These requirements reflect advice and guidance provided by the Council's Conservation team. Criteria within the framework used to carry out the Sustainability Appraisal of the plan (and sites within it) also reflect heritage considerations, as do the assessments contained in the Schedule of Site Appraisals (Examination Documents SA13, SA19 and SA20). Where appropriate, some further references to heritage considerations have also been added through the Focused Changes following feedback from Historic England on the Pre-Submission document. For example, a new clause has been added as Focused Change MC24 to Policy LA4 to refer to the need for the design, layout and landscaping of the site to safeguard the archaeological and heritage assets within and adjoining that development.
- 8.3 Furthermore, all planning applications will need to comply with Core Strategy Policy CS27: Quality of the Historic Environment, together with 'saved' policies from the Dacorum Borough Local Plan 1991-2011 pertaining to Listed Buildings and Conservation Areas and (Policies 119 and 120 / 121 respectively).
- 8.4 Archaeological Assessment have been carried out for all six Local Allocations (Examination Documents LA7, LA11, LA12, LA21, LA22, LA31, LA41, LA50, LA51 and LA57) and requirements within the policies and associated master plans reflect advice within the Landscape Character Assessment, which includes consideration of the historic environment. Local Allocation LA3 has also been subject to a Historic Landscape Assessment (Examination Document LA28) and LA1 to a Heritage Asset Impact Assessment (Examination Document LA4).
- 8.5 Further information on how schemes respect heritage assets, and meet the requirements of section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 will be requested at the planning application stage as appropriate. This will be a further opportunity to consider whether all relevant statutory tests are met.
- 8.6 In addition to referring to historic heritage as appropriate within specific sites in the development schedules, the Site Allocations introduces a new designation of 'Locally Registered Historic Parks and Gardens.' This list has been drawn up with the help and support of the Hertfordshire Gardens Trust and is intended to give further protection to hitherto un-designated heritage assets within the Borough. A full schedule of designated historic assets is contained in Appendix 5 of the submitted plan.

8.7 Further information regarding the Council's approach to heritage assets is set out in section 4 of the Looking After the Environment Background Issues Paper (Examination Document SA5).

9. Paragraph 18.31 of the CS says that the Water Cycle Study Scoping Report, which was prepared to support the CS, concluded that further work would be necessary in relation to a number of matters. It also advises that the local authorities and stakeholders involved will continue to plan for the necessary upgrades and that this will be progressed with the Site Allocations DPD. Has this work been undertaken. If so, what were the findings? If not, why not and is the Plan capable of being found sound in the absence of this information?

9.1 A Water Cycle Study is being carried out in conjunction with other authorities within Hertfordshire (and Chiltern District Council), water companies, the LEP and the Environment Agency. This study will holistically review the water environment (supply and waste water treatment), assess waste water infrastructure issues against planned growth (Phase 1), and, based on various growth scenarios, explore infrastructure options and solutions for any deficits identified (Phase 2).

9.2 Arcadis, the appointed consultants for this work, are projecting completion of the final report (both Phase 1 and 2) in late 2016, subject to scheduled inputs from key stakeholders. Wherever possible, the Council would prefer to make the Inspector aware of the findings of new studies in advance of the examination. Unfortunately, it is not possible to provide any draft findings of this study to inform the Site Allocations hearings, as the various phases of work are all interdependent upon each other to obtain a fully calibrated model and all of the study's participants have signed a Memorandum of Understanding agreeing to keep the interim work confidential as a result.

9.3 The Site Allocations DPD is capable of being found sound without the completion of this study for the reasons set out below.

9.4 Paragraph 13 of the statement of common ground between the Council, Thames Water and the Environment Agency (Examination Document SCG1) summaries Thames Water's view on whether a Water Cycle Study should be completed prior to the Site Allocations DPD. This states:

"Thames Water and the Council agreed that, despite the need for completion of an update to the Water Cycle Scoping Study (published in 2010) to assess the impact of future growth, waste water infrastructure upgrades for the levels of growth set out in the Core Strategy (and expounded into the Site Allocations DPD) could be appropriately dealt with by the developer at the planning stage of development. Thames Water agreed that this need not be a reason to prevent proposed development coming forward to meet the immediate needs of the Borough."

9.5 The situation has been fully discussed with Thames Water and the EA through a series of meetings (see Examination Document SUB6). The Council's view, accepted by the Environment Agency and Thames Water, is that it is preferable to have a comprehensive Water Cycle Study that takes a holistic approach to any

local-level Water Cycle Study. A holistic approach would assist in identifying waste and potable water issues in the whole of the catchment area; looks at a variety of cumulative growth scenarios; and covers a long time period (to 2051). Any study carried out unilaterally for Dacorum solely to inform the Site Allocations DPD would only have looked at potential infrastructure issues within the Borough (which excludes the principal waste water treatment works at Maple Lodge); would have covered a shorter timeframe; and been based on a Core Strategy growth scenario that is due to be reviewed in the very near future as part of the early partial review process.

- 9.6 Thames Water support the Site Allocations DPD as submitted, following some minor wording changes made to key housing sites through the Focused Changes process. These wording changes are also reflected in an Advice Note prepared and issued by the Council relating to waste water infrastructure planning for new development (see response to Question 19 below).
- 9.7 It is relevant to note that, as set out in the Statement of Common Ground, the EA initially submitted representations of support to the Site Allocations DPD. Their subsequent late objections do not raise any concerns over the deliverability of any individual sites within the Site Allocations DPD – rather they raise concerns regarding the overall quantum of development planned. This issue was a matter for the Core Strategy (but was not raised during its preparation or through the examination) and the role of the Site Allocations is to deliver the level of growth set out within this strategic document.
- 9.8 It is pertinent to note that Three Rivers District Council were in the same position as Dacorum when their Site Allocations DPD was examined i.e. they were reliant on the same Water Cycle Study Scoping Report (2010) and had not carried out any further work to consider the potential issues raised within that document (with the current county-wide work not then agreed or commissioned). Despite this, no general objection was raised to the plan by the EA, and no reference made by the EA to the need for that authority to take forward any additional technical work as advised in the Scoping Report. The Three Rivers Site Allocations DPD was found ‘sound’ by their Inspector and has now been adopted.
- 9.9 See also response to Questions 3, 16 and 18.

10. What work has been undertaken to assess the likely impact of proposed development on the Chilterns Area of Outstanding Natural Beauty?

- 10.1 The Core Strategy recognises that the Chilterns Area of Outstanding Natural Beauty (AONB) is one for the Borough’s most important landscape assets. Policy CS24: The Chilterns Area of Outstanding Natural Beauty seeks to conserve the special qualities of the AONB, and requires particular regard to be had to the protection of the prominent scarp slope.
- 10.2 In recognition of the importance of the AONB, the Site Allocations DPD intentionally avoids any new major development within this designated area, and requires any such development in close proximity (namely LA5) to respect its setting.

10.3 Regard has been had to paragraph 116 of the NPPF (Examination Document REG10) which states:

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

10.4 The Council has also taken into account the conclusion of relevant legal judgments, with regard to what constitutes 'major' development in the above context. The conclusion of Judge Lindblom in the R. (Forge Field Society) v Sevenoaks DC [2014] is that the matter is one of planning judgement and does not relate to a standard quantum of development. In other words it does not necessarily equate to what would be major development for the purposes of registering a planning application. Rather it should be assessed in terms of its location and likely impact.

10.5 The only new development sites within the AONB at all is the Gypsy and Traveller site and cemetery extension (Proposal C/1) that form part of Local Allocations LA5 and Proposal C/2 which covers the existing Amaravati Buddhist Monastery at Great Gaddesden.

10.6 Two existing proposals are carried forward from the current Dacorum Borough Local Plan 1991-2011 (Examination Document OT6). These are T/20 relating to safeguarding land at Tring station and T/22 – relating to improvements to cycle links between Tring station and Pitstone. Neither are expected to have a detrimental impact on the Chilterns AONB.

10.7 None of these proposals constitute 'major development' in terms of either the Development Management definition, or the interpretation of the Courts referred to above.

10.8 The Gypsy and Traveller site at LA5 will be approximately 0.4ha in size and accommodate 5 pitches. The location of this site has been carefully chosen to minimise the impact on the AONB by its location at the lowest point of the LA5 site, in a well screened location, with the inclusion of further natural screening being a clear requirement of Policy LA5 and the associated site master plan. Proposal C/1 relates to a detached extension to Tring Cemetery. The planning requirements for this site include the need for the '*Site to be well landscaped (particularly along its boundaries), appropriate to its location within the Chilterns*

Area of Outstanding Natural Beauty.’ This requirement has been extended through Focused Change MC63 to require *‘design details to be discussed with the Chilterns Conservation Board to ensure the proposal does not have an adverse effect on the AONB and its setting. Undertake protected species surveys and incorporate appropriate requirements into any planning application to ensure there would be no adverse impact.’*

- 10.9 The principle of the wider LA5 site has been established through the Core Strategy, where its locational impact was assessed against other site options on the edge of Tring. In his consideration of site LA5, the Planning Inspector concluded that *‘Whilst it will be important to ensure that the setting of the AONB is afforded appropriate protection, there is no reason to conclude that this cannot be satisfactorily achieved, primarily through the masterplan process’* (para 64 of Examination Document CS6).
- 10.10 A Landscape and Visual Impact Assessment (LVIA) has been carried out for LA5 by Barton Willmore (Examination Document LA54). This is a systematic appraisal that considers the site’s contribution to the landscape and the potential effects of development and includes detailed photographic assessment and mapping³. It is the intention to extend the current LVIA as the development proposal becomes more detailed, for example with the addition of a Night-time Lights Assessment. There will also be further consultation at the planning application stage as the landscape strategy develops. The LVIA accepts that the LA5 development will have an impact on local landscape character, so recommends a number of measures designed to benefit the local landscape and help to assimilate development into its wider setting. These measures are summarised in paragraphs 3.14 and 3.17 of the site master plan (Examination Document LA47).
- 10.11 Proposal C/2 relates to the phased improvement of the existing Amaravati Buddhist Monastery, on the existing built footprint of the site. Consultants Rolfe Judd were commissioned by the English Sangha Trust to prepare a master plan for the overall scheme. This was published in October 2013. The master plan includes sections on key views; trees and vegetation; design (including reference to the Chilterns Buildings Design Guide, prepared by the Chilterns Conservation Board) and a landscape strategy. Whilst the master plan has been subject to public consultation and incorporates some informal feedback from Council Officers, it has not been formally adopted by the Council. It was therefore not initially included in the Examination Library, but has now been added as Examination Document OT11.
- 10.12 See also response to Matter 14, Question 1 with regard to the reference within Proposal C/2 to the Chilterns Conservation Board and Matter 11, Question 2 with regard to the impact of Local Allocation LA5 on the AONB.

³ It is noted that the LVIA is a general assessment of the LA5 development and does not cover the specific impacts of the proposed Gypsy and Traveller site on the AONB.

11. Has the principle of removing land from the Green Belt already been established in the CS? If so, does this Plan deviate from principles set out in the CS in this regard?

- 11.1 Yes, the Core Strategy clearly establishes the principle and parameters for removing land from the Green Belt. Paragraph 8.29 states that:
- ‘A strategic review of Green Belt boundaries was not required by the Regional Spatial Strategy (2008). The Council’s own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change will be necessary in the Site Allocations DPD, other than to define these locations precisely and correct any minor anomalies that may still exist. While the development needs often relate to housing, some sites will include proposals for employment, social and community and/or leisure uses. The Council will only re-evaluate the role and function of the Green Belt, when it reviews the Core Strategy (see paragraphs 29.8 to 29.10).’*
- 11.2 This approach is reflected in the text of Core Strategy Policy CS5: Green Belt which states that *“There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted.’* This approach was accepted by the Core Strategy Planning Inspector and is reflected in the submitted Site Allocations DPD.
- 11.3 The Site Allocations does not deviate from this approach. As paragraph 2.4 of the submitted plan states, *‘The Core Strategy does not require a general review of the Green Belt boundary. However, in order to meet the strategic objectives and policies of the Core Strategy, boundaries of the Green Belt and Rural Area around existing towns and villages have been reviewed for minor anomalies. These changes will result in limited additions to, and deletions from, the Green Belt and Rural Area.’* Paragraph 2.5 goes on to clarify that *‘Appropriate new boundaries have also been defined for the Local Allocations (see Policies LA1-LA6). These sites will be removed from the Green Belt and become part of the town or village they adjoin.....’*
- 11.4 This reflects the position set out in response to the Inspector’s questions in Procedural Document PC2a.
- 11.5 A more comprehensive review of the role and function of the Green Belt is a clear requirement of the early partial review process (forming part of the new single Local Plan), and acknowledged as an important component of this review by the Core Strategy Inspector (Examination Document CS6). This technical work has already been prepared. Work on this has already begun.
- 11.6 The Council can therefore confirm that the submitted Site Allocations DPD does not deviate from the principles set out in the adopted Core Strategy.

11a. Do the exceptional circumstances, as required by the NPPF paragraph 83, exist to justify the Plan's proposed revision of the boundaries of the Green Belt.

- 11.6 As stated in response to Question 11 above, it was the role of the Core Strategy (Examination Document CS4) to establish the overall level of growth that should be planned for within the Borough, and how this would be accommodated. This included establishing the principle of six sites that would be released from the Green Belt to accommodate housing and other associated uses (the Local Allocations).
- 11.7 Whilst the actual Green Belt boundary changes were deferred to the Site Allocations DPD to define, the principle of housing and associated development at these six locations, together with the quantum of development they would accommodate has been established through the Core Strategy. Through the Core Strategy Examination process the Council set out the reasons why it considered there were demonstrable exceptional circumstances to warrant these Green Belt releases.
- 11.8 One of the roles of the Core Strategy Inspector was to assess whether these reasons were robust. It is clear from the Inspector's Report (Examination Document CS6), and his requirement for the Council to undertake an early partial review of the Core Strategy which would look again at the issue of housing need and the *'role and function of the Green Belt affecting Dacorum, including long term boundaries'* (paragraph 29.10) through a comprehensive Green Belt review, that he considered these exceptional circumstances to exist.
- 11.9 These circumstances have not changed since the Core Strategy was examined. The Local Allocations form an important part of the Council's overall housing target and takes account of the requirements in the NPPF (Examination Document REG10) for Councils to *'positively seek opportunities to meet the development needs of the area'* (paragraph 14) and *'boost significantly the supply of new housing'* (paragraph 47). The factors taken into account when setting this housing target remain as set out in paragraph 14.16 of the Core Strategy:

14.16 The choice of housing target, with its likely delivery level, takes a balanced approach to housing. The Council has considered:

- the amount needed to meet 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 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 to environmental constraints and impact upon the character of particular settlements; and
- the desire to protect the countryside.

11.10 The Core Strategy also explains how the Local Allocations fulfil a number of purposes (Paragraph 14.22):

- they extend the character and nature of housing supply, particularly for family housing;
- they will provide affordable housing locally;
- they can be planned in line with infrastructure capacity, particularly primary schools;
- they can be used to address local infrastructure deficits;
- they will also help maintain local population and the viability of settlements away from Hemel Hempstead.

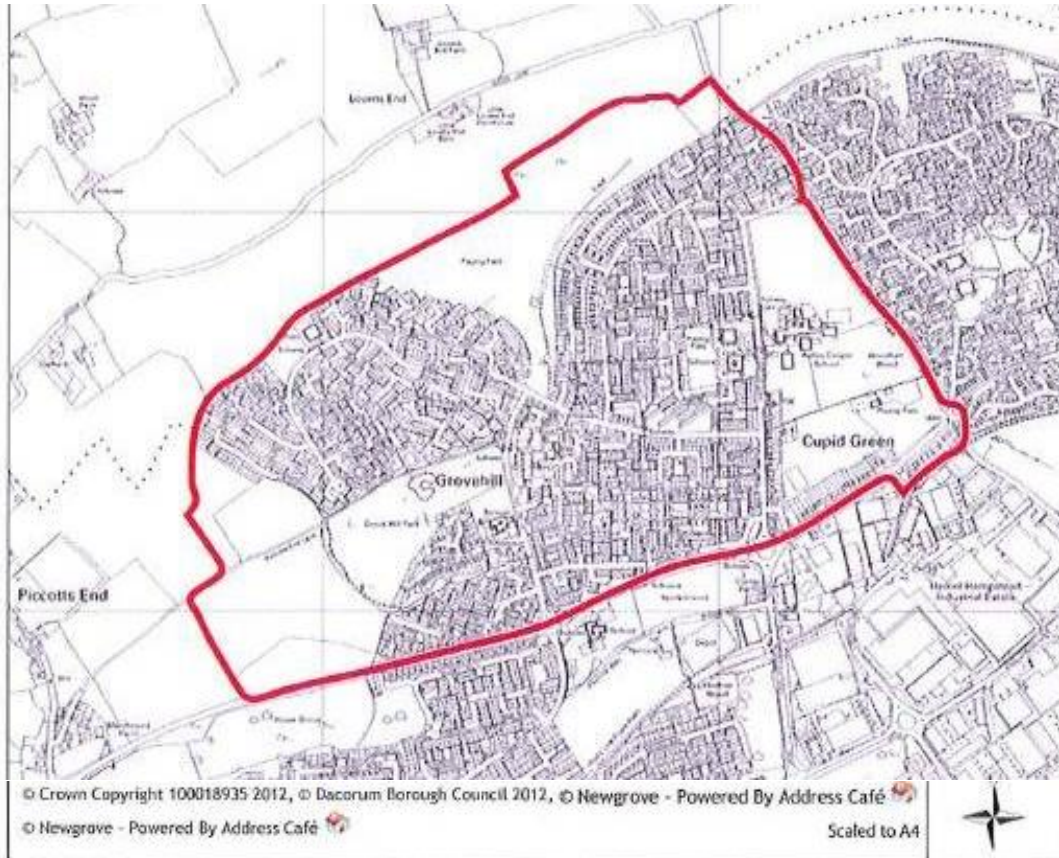
11.11 These reasons, and the justification for the Local Allocations, are further elaborated in the Background Paper: Selecting the Core Strategy Housing Target (Examination Document HG6) which formed part of the evidence submitted to the Core Strategy examination. This document includes discussion of the various housing target options (i.e. with and without changes to the Green Belt boundary) in the context of the requirements of the NPPF.

11.12 With regard to the correction of minor Green Belt boundary anomalies, this is also consistent with the approach established in the Core Strategy (see above). These changes are not being made to facilitate further development, but to correct genuine anomalies which have often arisen due to mapping errors or improvements to the quality of base maps now available on GIS, to ensure that the boundaries are clear and robust. The amendments also take into account guidance in the NPPF (see Paragraph 85 and in particular bullet points 2 and 6) regarding defining Green Belt boundaries.

11.13 In the light of the above, the Council considers that appropriate justification already exists for the proposed revision to the Green Belt, and that the role of the Site Allocations DPD is to deliver the policies of the adopted Core Strategy.

12. What is the latest position with the Grovehill Neighbourhood Plan? Are there any other emerging neighbourhood plans?

12.1 The only Neighbourhood Plan underway within the Borough (of which the Council is aware) relates to the Grovehill area of Hemel Hempstead. This is being prepared by the 'Grovehill Futures' Forum with support from Dacorum Borough Council. The agreed plan area is shown below. It intentionally includes the area proposed for release from the Green Belt and development for housing through Local Allocation LA1 (Marchmont Farm).



- 12.2 A draft of the Grovehill Neighbourhood Plan is currently being prepared, but has yet to be published. Pre-submission consultation is planned for later this year. Officers who have been assisting the Grovehill Futures group have confirmed that the plan supports the principle of the LA1 development. The plan's principal focus is however the regeneration and/or redevelopment of Henry Wells Square local centre, new housing, improving connectivity and public spaces and making better use of existing under-used garage blocks. The Neighbourhood Plan also includes the potential for redevelopment of the local centre that could deliver additional housing land (c. 200 homes). However, whilst accepted in principle, the work is not at a sufficiently advanced stage to justify a specific housing or mixed-use allocation within the Site Allocations DPD.
- 12.3 Further information is available on the Council's website <http://www.dacorum.gov.uk/home/regeneration/grovehill-future-project> and the Grovehill Future Group website www.grovehillfuture.org
- 12.4 The Council has received expressions of interest from several other Parish Councils and interested parties to develop Neighbourhood Plans for their areas. Officers have met with representatives of these groups to better understand their aspirations. To date, none have wished to progress their interest any further than these initial enquiries. This is largely as a result of better understanding the role of Neighbourhood Plans; the time and costs associated with their preparation; the potential for other mechanisms (such as local design statements or Parish Plans) to better suit their needs; and the 'place-based' approach already taken in the Council's own development plan.

13. Where necessary, do policies make it clear that their geographic application is illustrated on the policies map?

- 13.1 All policies, proposals and designations within the Site Allocations DPD that have a spatial element will be appropriately illustrated on the Policies Map. The precise boundaries for these designations (where they represent a change from those currently shown) are currently set out in the Map Book that forms part of the submitted Site Allocations DPD (Examination Document SUB1).
- 13.2 On adoption of the Site Allocations DPD, these boundaries will be included on a new, composite Policies Map for the Borough, which will supersede the current map that accompanies the Dacorum Borough Local Plan (Examination Document OT6).
- 13.3 The role of the Policies Map is clearly articulated in the introduction to the Site Allocations Written Statement:

Policies Map

1.12 The Policies Map (or Proposals Map as it was formerly called) illustrates the planning strategy for the Borough, by showing the boundaries of allocations and designations set by planning policies. It is revised as each new Development Plan Document (DPD) is adopted to ensure it reflects the most up-to-date strategy for the area. Some changes to the Policies Map originally published as part of the Dacorum Borough Local Plan 1991-2011 have already been made to reflect designations amended by the Core Strategy. It is now being revised further, and more significantly, to reflect the allocations and designations within this Site Allocations document.

- 13.4 In the majority of cases, policies within the Site Allocations DPD also include reference to the Policies Map within the policy text (Policies SA2, SA5, SA6, SA7, SA10 and Policies LA1-6).
- 13.5 Such references do not occur in the following 4 policies for the reasons set out below:

Policy	Commentary
SA1: Identified Proposals and Sites	Cross-reference could be added, but not considered essential due to references already included in key policies listed above.
SA3: Improving Transport Infrastructure	Includes cross reference to the road hierarchy, but not to all transport proposal, because the policy applies more widely than just to the schemes identified in the transport schedule. Policy wording could be amended to refer to fact that the schemes identified in the schedule are shown on the Policies Map, but this is not considered essential.
SA4: Public Car Parking	These are not currently shown on the Policies Map. They could be added, but this is not considered essential.
SA8: Local	Reference could be added, but not considered essential as there are

Allocations	already cross-references in Policies LA1-6.
SA9: Site for Gypsies and Travellers	Reference not required, as Gypsy and Traveller sites are not specifically identified on the Policies Map, but are shown instead on the site layouts within Policies LA1, LA3 and LA5, as they form part of these wider proposals – and individual site components are not split out into separate allocations within the development schedules.

- 13.6 There does not seem to be a consistent approach to referencing within Site Allocations DPDs prepared by other Councils. Three Rivers' adopted document does not appear to include cross-references in any of its policies; Hertsmere's Site Allocations and Development Management DPD (which has just been through examination) includes cross-referencing in some but not all of the Site Allocations policies; and the recently adopted Tunbridge Wells Site Allocations appears to include cross-references in all policies.
- 13.7 Whilst the Council does not consider it necessary to add cross references where they do not currently appear in the submitted plan, if the Inspector wishes such references to be added, they can be done so through a series of minor modifications.

National Planning Policy

14. Are there any policies in the Plan that do not accord with the Framework or advice in Planning Practice Guidance?

- 14.1 The role of the Site Allocations DPD is to take forward the policies set out within the adopted Core Strategy (Examination Document CS4). The Inspector appointed to examine the Core Strategy concluded that *'The Core Strategy complies with national policy except where indicated and modifications are recommended'* (Examination Document CS6). These modifications were made to the plan prior to its adoption.
- 14.2 Compliance of the Core Strategy with the NPPF was subsequently further tested through a High Court legal challenge. The Judge dismissed the challenger's case, refused their right to appeal the decision and awarded full costs to the Council (Examination Document CS1).
- 14.3 The Council is similarly satisfied that all of the policies and designations within the submitted Site Allocations DPD accord with both the NPPF of the PPG.
- 14.4 Whilst there have been some changes to Government guidance, and to the interpretation of Government guidance since this date, this has been considered by the Council and any necessary changes incorporated into the submitted plan. This includes changes made to Green Belt boundary at Local Allocation LA5 as a result of the Timmins High Court judgement (Examination Document REG7), and the publication of a new Planning Policy for Travellers (Examination Document REG4). Consideration of the impact of these national policy changes are set out in relevant Cabinet Reports pertaining to the Site Allocations DPD (see Examination Documents SUB8, SUB11 and SUB21) and the Background Issues Papers prepared for each section of the plan (Examination Documents

SA1, SA3, SA4 and SA5). Legal advice has been sought on these issues where appropriate from the Council's external legal adviser.

15. Are there any gaps in policy coverage? Have other policies been considered and discounted?

- 15.1 As explained in response to Matter 1, Question 3, the Council is satisfied that the coverage of the Site Allocations DPD accords with the intentions of both the Core Strategy (Examination Document CS4) and Local Development Scheme (Examination Document SUB7), and that there are no gaps in policy coverage.
- 15.2 Whilst consideration has been given to alternative ways to present the Site Allocations DPD – and particularly the level of detail to include in Policies LA1-LA6 and how to show these – there have been no additional policies that have been explicitly considered and discounted.
- 15.3 A review of overall policy coverage will be undertaken as part of the new single Local Plan process and this work has already commenced.

Evidence base

16. Is the evidence base relating to such matters as housing, employment, retail, and flood risk up-to-date and relevant?

- 16.1 The evidence base regarding matters such as housing, employment, retail and flood risk is as up-to-date as possible, bearing in mind the role of the Site Allocations in delivering the strategic policies and targets of the Core Strategy, which was adopted in September 2013.
- 16.2 The role of the Site Allocations DPD is to deliver the policies of the Core Strategy: not to pre-empt the content of any future Local Plan (incorporating the early partial review of the Core Strategy). This is supported by several recent High Court Judgements, including one pertaining to Dacorum's own Core Strategy.⁴ These decisions clarify a number of key points, including:
- A 'Local Plan' can comprise a series of DPDs. Dacorum's Site Allocations DPD is in-effect a 'daughter document' to the Core Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out;
 - Councils should continue with the preparation of Site Allocations DPDs even where they do not deliver the full OAN figure for the area.
 - The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered: not to reassess what these targets should be.

⁴ Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council.

- That in Dacorum's case, housing delivery is only expected to fall short of delivering full OAN (as defined at that time) in the latter part of the plan period, by which time a new Local Plan (via the early partial review) will be in place and will have reconsidered appropriate targets.

- 16.3 This view is reinforced by the fact that Dacorum's own Core Strategy Inspector was happy with the wording in paragraph 29.8 (introduced via a post Examination main modification) that *"The Council is committed to a partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs. Evidence gathering will begin in 2013. The purpose of the review is to reconsider housing need and investigate ways of meeting that need more fully."*
- 16.4 In the light of these decisions the approach taken by the Council to the Site Allocations DPD and the housing evidence that supports it, is both appropriate and legally compliant.
- 16.5 Updates to the Council's evidence base are currently underway (see response to Question 3 and 9 above). These however relate to the new single Local Plan (incorporating the early partial review of the Core Strategy). Whilst some of this information can be used to inform the current Site Allocations DPD e.g. viability assessments contained within the updated SHLAA, the role of the majority of documents is to inform the new Local Plan and the two processes must be kept separate.
- 16.6 See also response to Question 17 below.

17. Are there any important developments/changes since the submission of the Plan, for instance in terms of planning permissions/completions? Is the SHLAA and SHMA up-to-date and robust?

- 17.1 Please see response to Matter 4 Questions 1 and 7 (and related Appendices 1 and 5) for an update in terms of any important changes to allocations and significant housing permissions and/or completions and Matter 5 for an update in terms of any significant employment and retail permissions and/or completions since the Site Allocations DPD was submitted. Where appropriate, these changes are reflected in suggested Main Modifications or Minor Changes to the Plan (see the schedules in the Appendix to Matter 2).
- 17.2 The main changes are summarised as follows:
- Update to completions data to reflect the position as at March 2016.
 - Updating of text for some sites in the housing schedule to reflect their current status.
 - Increase in assumptions of site capacities for some key sites following additional site assessment and/or discussion with landowners.
 - Loss of employment land at Maylands Gateway following grant of permission for retail-led development on the Aviva site.

- 17.3 A number of representations to the plan have asserted that the Site Allocations DPD should reflect the level of objectively assessed need (OAN) identified through the recently published SW Herts Strategic Housing Market Assessment (January 2016), rather than deliver the target established through the Core Strategy (Policy CS17: New Housing). This approach would clearly be contrary to established case law. As outlined in response to Question 16 above, the role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan.
- 17.4 The housing programme in the Site Allocations takes into account the contribution from sites in the 2008 SHLAA (Examination Document HG13) as updated by the latest monitoring (as at 1st April 2015). The Council continues to refine the contribution from the SHLAA sites through this process and thus it considers the document to be robust. It also recognises that the SHLAA has recently been reviewed by consultants AECOM. However, the document's role (along with other emerging technical work) will be to inform the preparation of the new Local Plan (see paragraph 3.3 above) rather than the Site Allocations. The Council considers that there are sufficient sites currently identified in the housing programme to meet its housing target without having to rely on the updated SHLAA and in part it represents a continuation of the previous SHLAA. Furthermore, as part of assessing a wide range of sites, the SHLAA has already tested the housing allocations for their deliverability and developability.
- 17.5 A jointly commissioned SHMA has also been completed by GL Hearn (February 2016). This took into account the relevant housing market area (HMA) covering the four commissioning authorities of Dacorum, Hertsmere, Three Rivers and Watford, plus St Albans District. It considered housing need (market and affordable) arising over the 2013-2036 period, to inform local plan preparation. The SHMA points to a significant objectively assessed need for Dacorum (at 756 homes per annum) and for the other authorities in the HMA.
- 17.6 While the SHMA is a key document alongside other studies in the setting of the future housing target under the new Local Plan (incorporating the early partial review of the Core Strategy) this informs a separate process to the Site Allocations DPD (see paragraph 16.4 above). It is the role of the Site Allocations to take forward levels of development signalled by the Core Strategy and not to pre-empt the reconsideration of this by the new Local Plan.
- 17.7 In the light of these decisions the approach taken by the Council to the Site Allocations DPD in terms of information on housing need and availability is both appropriate and legally compliant.
- 17.8 The same principles apply in response to those objectors requesting additional Green Belt housing sites to be included within the plan. This is a matter for the Local Plan review process.
- 17.9 See also response to Question 16 above regarding the evidence base.

18. Does the Council have a programme for reviewing the key evidence base?

18.1 See response to Question 3 above for information on the evidence base review process.

19. Has sufficient regard been paid to infrastructure and flood risk? Are any of the infrastructure providers or the Environment Agency opposed to the principle of the development of any of the allocated sites? If so should these sites be deleted from the Plan?

19.1 The Council have given extensive consideration to infrastructure and flood risk matters during the development of the Core Strategy and Site Allocations DPD. The Inspector for the Core Strategy found this document sound and noted that *“the Infrastructure Delivery Plan Update concludes that the development proposed in the Core Strategy can be satisfactorily supported by the necessary infrastructure and no substantive evidence was submitted to demonstrate otherwise”* (Examination Document CS6).

19.2 During preparation of the Core Strategy, the Council assessed infrastructure requirements to ensure that the suggested growth could be accommodated through the preparation of the Hertfordshire Infrastructure Investment Strategy (2009) (Examination Document ID10) and 2013 update (Examination Document ID6), Water Cycle Scoping Study (2010) (Examination Document EN7), Dacorum Strategic Infrastructure Study (2011) (Examination Document ID11), including an Infrastructure Delivery Plan, and annual updates to the Infrastructure Delivery Plan thereafter (dated June 2012, January 2014 and June 2015) (Examination Document ID1- latest update). With regards to flood risk the Strategic Flood Risk Assessment (SFRA) Stage 1 (Examination Document EN11) and Stage 2 (Examination Document EN9) were completed. These evidence base documents supported and influenced the emerging Core Strategy and Site Allocations vision and spatial strategy. As part of the new Local Plan the Council has commissioned a Water Cycle Study for Hertfordshire. Please refer to Matter 2, Question 9 for more information. There is not considered to be a need to update the SFRA as there has been no substantive change to flood data since these documents were prepared.

19.3 The Council has a comprehensive Infrastructure Delivery Plan (InDP) which covers a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. The InDP provides an assessment of the infrastructure required to support the existing and planned levels of housing and employment development, as set out in the Core Strategy. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers, such as Thames Water and the Environment Agency. The InDP is updated regularly (usually on an annual basis). The current (2015) update (Examination Document ID1) has taken account of concerns regarding infrastructure issues raised through the Site

Allocations Pre-Submission consultation and provided an opportunity to discuss these further with providers. The timing of the InDP Update 2015 allowed key infrastructure concerns to be raised with providers and any necessary amendments made to the DPD and accompanying Local Allocation masterplans to ensure these are properly addressed.

- 19.4 The Council held a series of meetings to specifically discuss waste water and sewerage issues, and their potential impact on flood risk, with Thames Water (together with the Environment Agency) in early 2015 (Examination Document SUB6). A statement of Common Ground between Dacorum Borough Council, Thames Water and the Environment Agency has since been agreed (Examination Document SCG1). As a result of these discussions, planning requirements for a number of allocations within the Site Allocations DPD have been revised to address the issues raised. Matters raised by both parties are considered further below.
- 19.5 The Site Allocations DPD has been based upon a substantive evidence base for the Core Strategy, as it is in effect a 'daughter document' to the Core Strategy. The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered. As the role of the Site Allocations DPD is to deliver the policies of the Core Strategy; and not to pre-empt the content of any future Local Plan the Council considers that sufficient regard has been paid to infrastructure and flood risk. As such, the Core Strategy's evidence base remains relevant, updated through the InDP process and supported by site-specific studies and technical evidence added where necessary.
- 19.6 To ensure that due regard is given to water infrastructure during the planning application process, a short Advice Note entitled 'Planning Requirements for Waste Water Infrastructure Issues in Dacorum' has also been prepared and placed on the Council's website. This was enacted in response to the Council's discussions with Thames Water (as documented in the Statement of Common Ground, Examination Document SCG1); the Council has directly informed landowners connected to the six Local Allocation sites of the need for a Drainage Strategy and early informal discussions with Thames Water. The advice note informs developers of the planning requirements for those listed sites (Table 1 of Examination Document SCG1). It sets out what a Drainage Strategy should cover and provides contact details should further advice be required from Thames Water. Where necessary the Council will impose Grampian Conditions to ensure sewerage and waste water issues are appropriately addressed. This advice has been reiterated by Officers in meetings and pre-applications discussion on key sites.
- 19.7 The Council has also issued a second Advice Note specifically on the topic of Sustainable Drainage, to help ensure this issue is considered early in the planning and design stage, and that appropriate mechanism are put in place to ensure suitable maintenance of any flood-alleviation or mitigation measures.
- 19.8 None of the infrastructure providers or the EA is opposed to the principle of developing any of the allocated sites. As referred to above, the Council is taking steps to ensure all necessary infrastructure is delivered by working closely with

infrastructure providers and land owners, by the early highlighting of specific infrastructure requirements in allocations and in monitoring infrastructure through the InDP. As explained above, the Council has already made specific changes to accommodate matters raised by Thames Water.

- 19.9 The only outstanding infrastructure issue relates to comments from the Environment Agency regarding overall waste water / sewerage capacity.
- 19.10 In response to the Council's consultation on its Pre-Submission version of the Core Strategy, the Environment Agency expressed support for Policies CS29, CS31 and CS32 as well as specific paragraphs contained within the Core Strategy document. They also indicated that they considered the plan to be sound and legally compliant. No reference was made in these representations to concerns regarding waste water infrastructure capacity and any implications this may have on the water environment. Paragraph 29 of the Statement of Common Ground (Examination Document SCG1) provides more detail on the Environment Agency's comments at relevant consultation stages of the Core Strategy and close involvement in the development of the InDP.
- 19.11 It is a matter of fact that the Environment Agency's first response considered the Site Allocations document to be sound. Their second response, which raised concerns over the capacity of waste water infrastructure, was submitted to the Council over five weeks after closure of the statutory consultation period. The Council's legal adviser has advised that as the comments were not 'duly made' they did not need to be included within the Report of Representations, or passed to the Inspector. However, as evidenced by the Statement of Common Ground, the Council is keen to understand and address the concerns raised, where possible and practicable. However, the Environment Agency's concerns are not considered to relate to an issue of 'soundness' on a number of planning and legal grounds:
1. They relate to the overall quantum of development, rather than raising any concerns regarding individual sites. Such strategic level concerns should have been raised at the Core Strategy stage. Instead comments of support were received from the EA at this time.
 2. Thames Water supports the Council's approach as set out in the Site Allocations (as amended by a series of minor changes).
 3. The technical work required by the EA is already underway on a countywide basis and will be available to inform the early partial review of the Core Strategy. The EA and Thames Water are both involved with this work (see response to Question 9 above).
- 19.12 It should also be noted that the proposed development levels set out within the Pre-submission Site Allocations DPD reflect those accepted in principle in the adopted Core Strategy (Examination Document CS4). As the EA's concerns relate to the quantum of development which is already dictated by the adopted Core Strategy, the Council are unable to make change to accommodate their concerns. Any change would be unreasonable at this late stage in the plan-making process. They have not requested that any sites be deleted from the Site Allocations DPD.

- 19.13 The Council has held several meetings to discuss the Environment Agency's concerns. However, despite agreeing on many key matters, they have chosen to maintain their objection.
- 19.14 The Council do take the Environment Agency's concerns regarding waste water infrastructure seriously and are keen to address them as part of the work to inform the new Local Plan, which is also evidenced by the contents of the Statement of Common Ground.
- 19.15 Thames Water did not raise any objections through the Core Strategy process and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have only requested some minor wording changes to the text of the Site Allocations document, which the Council has made through the Focused Changes process (Minor Changes: MC3, MC4, MC5, MC6, MC7, MC9, MC19, MC20, MC22, MC23, MC43-47 inclusive, MC49, MC51-55 inclusive and MC58 (which relates to Proposals MU/1, MU/2, MU/3, MU/4, MU6; Local Allocations LA1, LA2, LA3, LA4, LA5 and LA6; and Housing Allocations H/2, H/3, H/4, H/5, H/7, H/8, H/9, H/10, H/11, H/13 and H/14)). Most of these changes are re-emphasising the need for early liaison between the developer and Thames Water to develop a Drainage Strategy to support the proposal. This will identify any infrastructure upgrades required to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of the site.
- 19.16 The landowners / developers of the six Local Allocations have been explicitly advised to liaise with Thames Water as soon as possible. This allows 'upfront' identification of the potential requirement for specific technical work to be carried out to assess capacity issues. This requirement is reiterated within the associated Local Allocation masterplans. If any more specific upgrade requirements are identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues, these will be reflected in the text of the masterplans and/or passed through to developers at the pre-application stage.
- 19.17 The largest site, Local Allocation LA3, has already been subject to a site-specified study relating to flooding and drainage issues (Examination Document LA33).
- 19.18 Mindful of the objections raised by the Environment Agency with regard to the waste water infrastructure and the potential impact upon the environment, the Council has prepared a Statement of Common Ground with Thames Water and the Environment Agency (see Examination Document SCG1). This Statement of Common Ground commits the Council to completing technical work including an appropriate assessment and Water Project for Hertfordshire (Water Cycle Study) as part of the new Local Plan process. It also confirms the requirements for sites; specifically where developers should seek early liaison with Thames Water. These actions are seeking to ensure development proposed by the Council is deliverable without detriment to the environment.
- 19.19 Please also see the Council's response to Matter 2, Question 9.

- 19.20 As previously stated, the role of the Site Allocations DPD is to provide more detailed guidance to enable delivery of the adopted Core Strategy, which already established the overall quantum and broad location of development, and the principle of releasing land from the Green Belt to accommodate growth through Local Allocations LA1-6. Its role is not therefore to revisit these strategic matters.
- 19.21 Neither the EA or any of the other infrastructure providers have requested the deletion of any allocated sites and the Council does not consider any such action to be necessary. The Council have where possible been pragmatic and incorporated changes to address concerns raised by consultees during the consultation stages of the Site Allocations DPD, and as such consider the Site Allocations DPD as submitted to be sound.

20. Have the highway authority accepted that the scale and location of development in the Plan will not cause significant problems?

- 20.1 Dacorum Borough Council acknowledges the need to have an up-to-date understanding of the implications of new development on the strategic and local road network. It is therefore important that there has been, and continues to be, close liaison with the main transport agencies. Both the local highway authority (Hertfordshire County Council) and the Highways Agency (now called Highways England) who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by either party, although it is acknowledged by all parties that some local highway improvements and mitigation measures will be required relating to specific site proposals. The Council is not proposing growth in the Site Allocations document significantly above the level set out in the Core Strategy (apart from an appropriate buffer allowance) and appropriate highway improvements have already been identified in order to accommodate the level of planned growth.
- 20.2 In Hemel Hempstead the consideration of highway issues has reflected outputs from the Hemel Hempstead Transport Model (Paramics model). This model is managed by specialist transport consultants on behalf of Hertfordshire County Council. A number of model runs have been undertaken throughout the preparation of the Core Strategy and Site Allocations DPDs to ensure that the most up-to-date information regarding the scale and location of new development within the town is reflected. These are as follows:
1. 2008 base model (May 2009).
 2. 'Do minimum' models for 2021 and 2031- accompanied by a Future Years Issues Report (May 2009).
 3. LDF Option Test Western Hemel (August 2010).
 4. Combined Local Plan Test (July 2012).
 5. Morrisons Development Test (Summer 2013).

- 20.3 In addition to the above, a further model run was carried out in Spring 2015 to ensure that there had been no material change in circumstances since 2013. This also helped to inform decisions regarding any changes that may need to be made to the Site Allocations DPD (and associated Local Allocation master plans) to take account of concerns raised through representations. The Highway Authority has advised that the 2015 model outputs indicate that there has been no material change in highway conditions since the Site Allocation Pre-Submission document was prepared and that there are no issues highlighted that cannot be ameliorated through appropriate mitigation.
- 20.4 In addition to transport modelling, specific traffic studies have been prepared for Local Allocations LA1 and LA3. These have taken account of the Transport Model and been agreed with the Highway Authority. Any necessary highway improvements are referred to in the relevant Local Allocations policies of the Site Allocations document, and elaborated in the site master plans. The Highway Authority has confirmed through their representations that they support the content of all.
- 20.5 For parts of the Borough not covered by the Paramics Model, the Council has taken advice from the Highway Authority regarding highway issues. This advice is reflected in the planning requirements for individual sites and in the Schedule of Transport Proposals. Site LA5 currently has a Transport Scoping Report which has also been agreed with the Highway Authority.
- 20.6 Officers met with a representative from Highways England to discuss their representations in May 2015. Highways England have subsequently confirmed by email that their comments should not be treated as an objection to either the overall level of development planned for the Borough, or to any specific site(s). Rather, they required some further clarification regarding the work that had been carried out, and future work planned, to consider the impact of current and future development on the strategic road network. This information has been included in an update to the September 2014 version of the Sustainable Development Strategy Background Issues Paper (Examination Document SA3). Highways England are also aware (and involved with) the development of a new county-wide transport model (known as Comet) that will be used to test the impact of future growth scenarios emerging from the new Local Plan process. The countywide highway (COMET) model is now available to inform ongoing Local Plan works. It is intended that districts will be able to make use of the model to identify the best locations of strategic growth for the next round of Local Plans / Local Plan reviews from 2016 onwards.
- 20.7 Moving forward, the Council continues to work closely with the Highway Authority on a number of transport studies, including the Maylands Growth Corridor Study (relating to the transport network in the Maylands area of Hemel Hempstead), and preparation of a 'Transport Vision' and Growth and Transport Plan for Hemel Hempstead.
- 20.8 Liaison will also be required on any additional transport assessments required for the larger sites allocated within the Site Allocations DPD, as pre-application discussions progress. For all development sites, detailed highway issues will be

considered as part of the planning application process, for which the Highway Authority are statutory consultees. Appropriate highway improvements and mitigation measures will be secured through developer contributions and agreements.

Note: Hertfordshire County Council, as the local highway authority, have agreed and support the above response and will be supporting the Borough Council at appropriate hearing sessions.



Dacorum Borough Council

Local Planning Framework

DACORUM SITE ALLOCATIONS DPD EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Matter 2: General Matters - Appendices

September 2016

Schedule of Proposed Main Modifications

Notes:

- Deleted text is shown via ~~strike through~~, whilst new text is underlined.
- The source of modification is denoted as follows:

FC	Consideration of Focused Changes representations
M	Consideration of Inspector's matters
H	Discussion at hearing sessions

(A). MAIN MODIFICATIONS AFFECTING WRITTEN STATEMENT:

Site Allocations Reference / Section	Amendment Required	Source of Amendment																												
STRENGTHENING ECONOMIC PROSPERITY																														
Proposal S/1	Amend Focused Change SC6 as follows: 'Acceptable uses are retail and leisure uses. Approximately 7,000 sqm (gross) of retail floorspace is acceptable, except for the sale and display of clothing and footwear, unless ancillary to the main use of an individual unit. <u>The nature and scale of development should aim to maximise the use of the site and ensure no significant adverse impact on Hemel Hempstead town centre. The sale and display of clothing and footwear is not acceptable, unless ancillary to the main use of an individual unit.</u>	FC																												
Table 1	Amend the entry for Jarman Fields in Table 1 (Out of Centre Retail Locations (updated) as follows: <table border="1"> <thead> <tr> <th>Location</th> <th>Main uses</th> </tr> </thead> <tbody> <tr> <td colspan="2"><i>Out of centre retail locations</i></td> </tr> <tr> <td colspan="2">Hemel Hempstead</td> </tr> <tr> <td>• Sainsbury, Apsley Mills Retail Park, London Road (Sainsbury, Apsley)</td> <td>Food retailing</td> </tr> <tr> <td>• Remainder of Apsley Mills Retail Park, London Road (Apsley Mills)</td> <td>Bulky, non-food goods</td> </tr> <tr> <td>• Two Waters, London Road (Two Waters)</td> <td>Bulky, non-food goods</td> </tr> <tr> <td>• Homebase and Wickes, London Road (London Road)</td> <td>Bulky, non-food goods</td> </tr> <tr> <td>• B&Q, Two Waters Road (Cornerhall)</td> <td>Bulky, non-food goods</td> </tr> <tr> <td>• London Road/Two Waters Way (Two Waters) <i>(new site – see Map Book Section 6)</i></td> <td>Food retailing</td> </tr> <tr> <td colspan="2">Berkhamsted</td> </tr> <tr> <td>• Gossoms End / Billet Lane <i>(new site – see Map Book Section 6)</i></td> <td>Food retailing</td> </tr> <tr> <td colspan="2">Tring</td> </tr> <tr> <td>• Tesco, London Road (Tring)</td> <td>Food retailing</td> </tr> <tr> <td colspan="2"><i>Out of centre retail and leisure locations</i></td> </tr> </tbody> </table>	Location	Main uses	<i>Out of centre retail locations</i>		Hemel Hempstead		• Sainsbury, Apsley Mills Retail Park, London Road (Sainsbury, Apsley)	Food retailing	• Remainder of Apsley Mills Retail Park, London Road (Apsley Mills)	Bulky, non-food goods	• Two Waters, London Road (Two Waters)	Bulky, non-food goods	• Homebase and Wickes, London Road (London Road)	Bulky, non-food goods	• B&Q, Two Waters Road (Cornerhall)	Bulky, non-food goods	• London Road/Two Waters Way (Two Waters) <i>(new site – see Map Book Section 6)</i>	Food retailing	Berkhamsted		• Gossoms End / Billet Lane <i>(new site – see Map Book Section 6)</i>	Food retailing	Tring		• Tesco, London Road (Tring)	Food retailing	<i>Out of centre retail and leisure locations</i>		M
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Site Allocations Reference / Section	Amendment Required	Source of Amendment
	<ul style="list-style-type: none"> Jarman Fields (<i>new site – see Map Book Section 6</i>) <div style="border: 1px solid black; padding: 2px; display: inline-block;"> Food retailing and bulky non-food goods (<u>excluding clothing and footwear unless ancillary to the main use of a unit</u>). Leisure uses. </div>	
PROVIDING HOMES AND COMMUNITY SERVICES		
Policy LA4	Amend this bullet point of the 'Delivery and Phasing' section as follows: <i>'Contributions may also be required towards offsetting loss of wildlife resource and, following early liaison with Hertfordshire County Council (Ecology) Ecology.'</i>	M
Proposal H/2	Amend the text of Proposal H/2 as follows: Net Capacity: 460 350 Planning Requirements: <u>There is potential for the capacity to be exceeded if fully justified against these constraints, and subject to viability considerations and achieving a high quality design that protects the local character.</u>	M
Proposal H/5	Amend the text of Proposal H/2 as follows: Net Capacity: 45 36 Planning Requirements: <u>Application to be approved for 36 homes subject to completion of legal agreement.</u>	M
Proposal H/9	Amend the text of Proposal H/9 as follows: Net Capacity: 25-35 31 Planning Requirements: <u>Application approved for 31 homes.</u>	M
Proposal H/12	Amend the text of Proposal H/12 as follows: Net Capacity: 50 66 Planning Requirements: <u>Application approved for 43 homes but revised scheme being pursued for higher capacity.</u>	M
Proposal H/14	Amend the text of Proposal H/14 as follows: Net Capacity: 45 11 Planning Requirements: <u>Application approved for 11 homes.</u>	M
Proposal MU/2	Amend the text of Proposal MU/2 as follows: Net Capacity: 200 400	M
Proposal MU/8	Amend the text of Proposal MU/2 as follows: Net Capacity: 44 23 Planning Requirements: <u>Application approved for 23 homes.</u>	M

(A). MAIN MODIFICATIONS AFFECTING POLICIES MAP:

(None)

Schedule of Proposed Minor Changes

Notes:

1. Deleted text is shown via ~~strike through~~, whilst new text is underlined.
2. The source of modification is denoted as follows:

FC	Consideration of Focused Changes representations
M	Consideration of Inspector's matters
H	Discussion at hearing sessions


(A). MINOR CHANGES AFFECTING WRITTEN STATEMENT:


Site Allocations Reference / Section	Amendment Required	Source of Amendment
PROMOTING SUSTAINABLE DEVELOPMENT		
Proposal MU/3	Planning Requirements: Insert the following sentence after sentence 1: "Development brief required."	
PROVIDING HOMES AND COMMUNITY SERVICES		
Policy LA1	Delete the following text (suggested as Focused Change MC18): 'The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.' and replace with the following text: <u>'The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate compliance with this Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations.'</u>	FC
Policy LA2	Delete the following text (suggested as Focused Change MC21): 'Limit housing to two storeys, except where a higher element would create interest and focal points in the street scene, and would not be harmful to the historic environment.' and replace with the following text: <u>'Limit housing to two storeys, except where two and a half storey housing would create interest and focal points in the street scene, and would not be harmful to the historic character.'</u>	FC
Policy LA3	Delete the following text (suggested as Focused Change MC25): 'The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'	FC

Site Allocations Reference / Section	Amendment Required	Source of Amendment
	<u>housing development and outline permission for the other elements of LA5. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'</u>	
Proposal L/4	<p>Amend the text of Proposal L/4 (Focused Change SC10) as follows:</p> <p>Proposal L/4</p> <p>Location Dunsley Farm, London Road, Tring</p> <p>Site Area (Ha): 2.7</p> <p>Planning Requirements: Proposal linked to the potential future redevelopment of Tring School to make provisions for detached playing fields in the event that they should be required as result of the school's physical expansion. The site should provide sufficient space for playing pitches for outdoor sports in order to meet the school's requirements and Sport England <u>standards guidance</u>. These playing pitches will be also be made available for community use. <u>Existing hedgerows to be retained and enhanced where possible to minimise any impact upon the ecological value of the site, including existing wildlife corridors. Pedestrian access to the site to be via adjacent cricket pitch. Consideration to be given to the provision of a pedestrian crossing point on Station Road to ensure safety of movement between the site and school.</u></p>	FC


(B). MINOR CHANGES AFFECTING POLICIES MAPS:

Site Allocations Reference / Section	Amendment Required	Source of Amendment
Policy LA1	<i>Revised site layout to recognise existing pedestrian link between Link Road and Margaret Lloyd Park within indicative block layout; and to remove reference to a specified landscaped buffer on the western boundary of the site to enable a natural delineation along the planted settlement edge.</i>	FC

Site Allocations Reference / Section	Amendment Required	Source of Amendment
	 <p>Existing pedestrian links retained and enhanced.</p> <p>Potential for emergency pedestrian / cycle link with Laidon Square.</p> <p>Green pedestrian link along Picotts End Lane</p> <p>Landscape buffer to define the extent of the traveller's site</p> <p>Landscape buffer along whole western edge to minimise visual impact from Picott's End and across the Gade Valley</p> <p>SUDs feature incorporated as part of open space at lowest point of the site.</p> <p>Marchmont Farm Preferred option Masterplan</p> <p>Legend:</p> <ul style="list-style-type: none"> Margaret Lloyd Park Extension to Margaret Lloyd Park New open space Development plots Roundabout access road Primary vehicular route Secondary vehicular route Pedestrian and cycle connection Main pedestrian routes Tree lined streets Landscape buffer Primary residential frontage Secondary residential frontage Enhanced footpath alongside Margaret Lloyd Park 	
Policy LA2	Minor amendments to framework plan to make clear that there is no vehicular access linking with existing residential areas via Townsend).	FC

Site Allocations Reference / Section	Amendment Required	Source of Amendment
		
Policy LA3	<i>Minor amendments to framework plan to remove reference to footpath access extending outside of the master plan area, to ensure consistency with the updated plan in the Master Plan document and to show correct extent of site in south west corner to tally with site boundary on Policies Map and master plan.</i>	FC

Site Allocations Reference / Section	Amendment Required	Source of Amendment																																	
	<p>SCHEDULE OF RESIDENTIAL PARCELS</p> <table border="1"> <tr><td>H1</td><td>1.00ha</td><td>2.95ac</td></tr> <tr><td>H2</td><td>1.75ha</td><td>4.33ac</td></tr> <tr><td>H3</td><td>5.58ha</td><td>13.79ac</td></tr> <tr><td>H4</td><td>6.49ha</td><td>16.08ac</td></tr> <tr><td>H5</td><td>1.52ha</td><td>3.75ac</td></tr> <tr><td>H6</td><td>2.49ha</td><td>6.15ac</td></tr> <tr><td>H7</td><td>0.88ha</td><td>2.23ac</td></tr> <tr><td>H8</td><td>3.17ha</td><td>7.83ac</td></tr> <tr><td>H9</td><td>2.00ha</td><td>4.94ac</td></tr> <tr><td>H10</td><td>6.10ha</td><td>15.08ac</td></tr> <tr><td>TOTAL</td><td>31.41ha</td><td>77.57ac</td></tr> </table> <p>PS/COM 2e PRIMARY SCHOOL & COMMUNITY FACILITY 2.40ha 5.93ac</p> <p>SITE BOUNDARY 52.69ha 130.19ac</p> <p>RESIDENTIAL PARCELS 31.41ha 77.57ac</p> <p>PRIMARY ROAD NETWORK</p> <p>PRIMARY ACCESSES</p> <p>FOOTPATH/CYCLE ROUTES</p> <p>GREEN SPACE FRAMEWORK</p> <p>POTENTIAL ALLOTMENTS</p> <p>POSSIBLE SURFACE WATER BALANCING</p> <p>STRUCTURAL TREE BELTS</p> <p>REINFORCED TREE BELTS</p> <p>POTENTIAL LOCATION FOR TRAVELLERS SITE</p> <p>© Vincent & Goring Limited PROJECT TITLE Land at Fields End HEMEL HEMPSTEAD Hertfordshire DRAWING TITLE Land use and access SCALE: 1:5000@A3 DATE: MAY 2014 CHECKED: HNA PROJECT No. 4107 600E VINCENT AND GORBING CHARTERED ARCHITECTS AND TOWN PLANNERS STERLING COURT, NOTTON ROAD, STEVENAGE, HERTS TELEPHONE: 01438 316311 FAX: 01438 722035</p>	H1	1.00ha	2.95ac	H2	1.75ha	4.33ac	H3	5.58ha	13.79ac	H4	6.49ha	16.08ac	H5	1.52ha	3.75ac	H6	2.49ha	6.15ac	H7	0.88ha	2.23ac	H8	3.17ha	7.83ac	H9	2.00ha	4.94ac	H10	6.10ha	15.08ac	TOTAL	31.41ha	77.57ac	
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H10	6.10ha	15.08ac																																	
TOTAL	31.41ha	77.57ac																																	
Policy LA5	Replace existing indicative layout map with amended version below which deletes the words 'and other facilities' from the label for 'Cemetery car park', for consistency with changes made to the draft master plan.	FC																																	

Site Allocations Reference / Section	Amendment Required	Source of Amendment
		
<p>Policy LA5</p>	<p>Delete the existing text for key development principle 11, as follows, for consistency with changes made to the associated master plan:</p> <p>'Locate car parking (at least 30 spaces) and other facilities for the cemetery in the development area, adjacent to the cemetery extension.'</p> <p>and replace with the following text, as it is uncertain whether the other facilities for the cemetery will be located in the new car park or within the existing cemetery:</p> <p><u>'Locate car parking (at least 30 spaces) for the cemetery in the development area, adjacent to the cemetery extension.'</u></p>	<p>FC</p>

Maps showing locations of additional housing and traveller sites promoted by representors during the Pre-Submission stage

