



Shaping
growth in
Dacorum



The Development Strategy Background Topic Paper

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

Background Topic Papers

Introduction

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

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

These papers form part of the evidence base and are intended to make it easier to understand the Council's emerging approach.

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1. Introduction

- 1.1 The Borough of Dacorum is facing challenging pressures for new development over the next 18 years which it must tackle through the Dacorum Local Plan (2020-2038). In particular, the need for homes, employment land and associated infrastructure is much higher than faced by previous Plans yet this has to be planned for in the context of the same extensive planning and environmental constraints. Thus the Plan must demonstrate how it is meeting its development needs taking into account the many constraints and opportunities of the Borough.
- 1.2 This background topic paper provides a summary to date of how the Council's approach to growth options in the Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth has developed and what has influenced those decision. It explains what this draft Local Plan took into account to date in developing its approach and how it has narrowed down reasonable policy options in terms of its:
- evidence base;
 - feedback from the Issues and Options consultation;
 - ongoing engagement with key stakeholders and meeting its obligations under the Duty to Cooperate; and
 - testing of options through the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment and Habitats Regulations Assessment.
- 1.3 While the selection of sites has informed the development strategy and vice versa, this matter is dealt with in more detail in the Site Selection topic paper. Similarly, you should note that there is significant overlap with the development strategy and other documents that are related to it. This document will provide cross-referencing to these relevant topic papers and studies, as appropriate.
- 1.4 This background topic paper is published alongside the Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth for consultation. It should be read in conjunction with a series of related and complementary topic papers that explain the Plan's emerging overall policies, visions and objectives.

2. Policy Context

- 2.1 The drafting of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth, particularly in developing its spatial strategy for the Borough, has been prepared in the context of a broad national, strategic and local policy framework.

National Planning Policy Framework

- 2.2 National advice on housing is provided through the National Planning Policy Framework (NPPF), with further guidance through the National Planning Practice Guidance (NPPG). There are many elements of the NPPF that influence preparing a development strategy and these are summarised below.
- 2.3 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development (para. 11). It also identifies a need for the planning system to perform an economic role, a social role and an environmental role, if sustainable development is to be achieved. In terms of plan-making this means:
- Positively seeking to meet the development needs of its area;
 - Strategic policies providing for objectively assessed needs for housing and other uses, as well as any unmet needs from neighbouring areas subject to protecting areas or assets of particular importance or where adverse impacts of doing so would outweigh the benefits as measured against the NPPF as a whole.

In Dacorum's case, the areas or assets of particular importance in the NPPF (Footnote 6) include the Green Belt, Chiltern Area of Outstanding Natural Beauty, SSSI and areas of risk from flooding. Cumulatively, these cover a large area of the Borough and will impact on decisions on the overall spatial strategy.

- 2.4 The Plan must set out strategic policies to address its development priorities for its area (para. 17). The strategic policies will be key as these explain the overall strategy for the pattern, scale and quality of development, and make sufficient provision for a range of development needs, infrastructure and community facilities while addressing the impact of this on the natural and built environment and climate change (para. 20).
- 2.5 The NPPF emphasises the importance of local planning authorities fulfilling their requirements under the Duty to Cooperate and undertaking effective engagement on strategic matters, especially where they relate to cross-boundary development needs and infrastructure issues, with a range of relevant bodies (paras. 24-27 inc.).
- 2.6 Local Plans should be informed throughout their preparation by a Sustainability Appraisal (para. 33). This should demonstrate how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).

- 2.7 When the Plan Local plans are examined they must have been prepared in accordance with legal and procedural requirements, and satisfy the test of “soundness” (para. 35). Plans are ‘sound’ if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

- 2.8 Plans should promote an effective use of land in meeting the need for homes and other uses that makes as much use as possible of previously-developed or ‘brownfield’ land (para. 120). They should also seek to achieve appropriate densities taking into account a range of factors (paras. 122-123).

Planning Practice Guidance

- 2.9 Further national guidance is provided through the National Planning Practice Guidance (NPPG). Key points in the Plan-Making guidance relating to preparing a development strategy are highlighted below.

- 2.10 Plans must set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure. This includes conserving and enhancing the environment, mitigating and adapting to climate change, and achieving well designed places. Paragraph: 001

- 2.11 Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents (taken as a whole). Paragraph: 001

- 2.12 Local Plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach involving gathering evidence, carrying out a Sustainability Appraisal to inform the preparation of local plans and undertaking effective engagement and consultation with interested parties. Paragraph: 034

- 2.13 Strategic policy-making authorities are required to cooperate with each other on strategic matters, which includes spatial development strategies. They should prepare statement(s) of common ground, throughout the plan-making process. Local planning authorities are also bound by the statutory duty to cooperate. Paragraph: 009
- 2.14 Local Plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach. This involves gathering evidence, carrying out a Sustainability Appraisal to inform the preparation of local plans and effective engagement and consultation with a variety of interested parties. Paragraph: 034
- 2.15 Every local plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. It plays an important part in demonstrating that the local plan reflects sustainability objectives, has considered reasonable alternatives, and should incorporate a Strategic Environmental Assessment. Paragraph: 037
- 2.16 The local plan may also require a Habitats Regulations Assessment if it is considered likely to have significant effects on habitats sites or species located in the local planning authority's area or in its vicinity, as set out in the Conservation of Habitats and Species Regulations 2017. This is especially relevant to Dacorum as it is affected by the Chilterns Beechwood Special Area of Conservation. Paragraphs: 037 and 043

Joint Strategic Plan (JSP)

- 2.17 Dacorum has a substantial history of co-ordinated working on planning issues and its evidence base, with adjoining districts. It has agreed with St Albans and City and District, Three Rivers, Watford and Hertsmere and Hertfordshire County Council (HCC) to prepare a place growth and development Plan (Joint Strategic Plan) up to 2050 for South West Hertfordshire. This includes a signed Memorandum of Understanding between the partners. They have also secured planning delivery funding from MHCLG to deliver the JSP.
- 2.18 The five districts and HCC are currently carrying out high- level visioning work. Two major and complementary projects are underway: a strategic growth location study and a multi modal transport study. Both studies are due to report in spring 2020.
- 2.19 Given the time horizon of the JSP, it will not influence how the Council prepares the development strategy.

Local Plan Context

- 2.20 The following Plan documents will be replaced by the new Local Plan:

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

2.21 There is only one “made” Neighbourhood Plan (covering the neighbourhood of Grovehill in Hemel Hempstead). Two other plans are being prepared for Bovington and Kings Langley.

Other Local Strategy

(i) Dacorum’s Growth and Infrastructure Strategy

2.22 The Dacorum’s Growth and Infrastructure Strategy (G&IS) provides a long term visions for the Borough to 2050. The Strategy has informed the early stages of developing the spatial objectives for the new Local Plan. It covers six over-arching themes:

- Building Dacorum’s future with homes for everyone
- Generating a vibrant economy with opportunities for all
- A happier, healthier and safer Dacorum
- Creating a clean, green and attractive Dacorum
- On-track for a better transport network
- Harnessing the opportunity of technology and digital connectivity

The G&IS is discussed in further detail in chapter 3.

(ii) Delivering for Dacorum (Corporate Plan 2020-2025)

2.23 The Corporate Plan sets out short to medium term vision and priorities for the Borough over the period 2020-25. These priorities cover a number of themes:

- A clean, safe and enjoyable environment
- Building strong and vibrant communities
- Ensuring economic growth and prosperity
- Providing good quality affordable homes, in particular for those most in need
- Ensuring efficient, effective and modern service delivery

2.24 The Corporate Plan highlights a number of issues which are reflected in the development strategy including:

- the Council’s commitment to addressing climate change;
- working with the Hertfordshire LEP, St Albans City and District Council, and Hertfordshire County Council to deliver a new Enterprise Zone (the Hertfordshire Innovation Quarter) with the aim of helping to establish new enviro-tech and high value businesses;
- bringing forward significant new housing delivery and space for business to grow and flourish;

- enabling the delivery of Hemel Garden Communities to deliver new homes and jobs, and help transform Hemel Hempstead in the process;
- working with Hertfordshire County Council to deliver a sustainable transport plan for Hemel Hempstead linked to major growth and regeneration, helping to provide residents and businesses greener alternatives to travel by private vehicles;
- working with partner organisations to improve public transport connections by delivering a Multi Modal Transport Interchange for the Maylands Business Park;
- promoting Dacorum as a prime location for inward investment and to help emerging sectors flourish; and
- supporting the delivery of more affordable homes.

(iii) Climate Change Emergency

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

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

2.26 The Council is developing a Climate Change Strategy and Action Plan to explain how it will achieve a net carbon neutral position across its services by 2030. This includes data collection/baselining data, developing its carbon offsetting approach, identifying priorities and programmes for services, working with partner organisations to develop a consistent approach to climate change, and community outreaching/persuasion. The Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth is seen as a key vehicle to focus on the climate change mitigation requirements of new development and in taking responsibility for biodiversity, green energy and environmental requirements.

2.27 Therefore, the climate emergency has placed an even greater emphasis on the development strategy delivering growth in a sustainable way.

Wider Strategic Context

2.28 The Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth has been prepared within a broader strategic context including:

(i) The South West Herts Growth and Transport Plan (GTP)

2.29 The County Council have prepared and consulted on during July-September 2018 a GTP that seeks to help direct and plan transport improvements and investment in South West Hertfordshire up to 2031. It takes the policies from the Local Transport Plan (LTP4) for Hertfordshire and develops them for the south-west part of the county, including the boroughs and districts of Dacorum, Watford and Three Rivers, but also parts of Hertsmere and St Albans District. The plan considers travel between the main towns of Hemel Hempstead, Watford and Rickmansworth as well connections to St Albans, Luton, Bushey and Harrow.

2.30 The GTP identifies interventions at a high level of detail. It includes a high-level appraisal of the different options and interventions. This plan describes interventions as schemes, projects or linked project groups, which are bundled together into nine Packages that target particular corridors and areas. The packages of relevance to Dacorum are:

Package No.	Settlement affected	Settlement indirectly affected
PK1 Hemel Hempstead East – West Cross Town Corridor	Hemel Hempstead Kings Langley	-
PK2 Maylands (Hemel Hempstead)	Hemel Hempstead	-
PK3 Hemel Hempstead – Luton Corridor	Hemel Hempstead	-
PK6 Watford - Hemel Hempstead Corridor	Hemel Hempstead	Berkhamsted Tring

2.31 The County Council have also assessed each intervention in terms of its likely cost, timescale for implementation, potential risk and likelihood of funding. Finally, they considered how well each package of schemes/projects performed. A preferred set of packages has been proposed based on the scoring.

2.32 Transport matters are dealt with in more detail in the Transport topic paper.

(ii) Hertfordshire Innovation Quarter (IQ)

2.33 The Hertfordshire Innovation Quarter (Herts IQ) is a new Enviro-Tech based Enterprise Zone and is a key component of the Hemel Garden Communities programme (see paragraphs 4.35-4.45) and its aim to transform and renew the town. It has been prepared by the Hertfordshire Local Enterprise Partnership in conjunction with Hertfordshire County Council, St Albans City and District Council and Dacorum Borough Council. It also harnesses the expertise of partners Rothamsted Research, Building Research Environment (BRE), and the University of Hertfordshire.

- 2.34 The Herts IQ aims to attract a wide range of high value business sectors linked to environmental technologies, such as off-site, modern methods of construction, agriculture-based technologies and digital industries. The multi-site zone covers a smaller area in the existing Maylands Business Park, land owned by the Council (6 ha), west of Green Lane and a much larger 55 ha strategic site within St Albans (and adjoining Hemel Hempstead to its east).
- 2.35 The Herts IQ forms a critical component of the wider Hemel Gardens Communities programme. It seeks to deliver some 10,000 jobs alongside the 11,000 homes proposed. The Herts IQ builds on the town's established role as a key employment centre that benefits from a high-level of self-containment, a number of strategic road and rail links, and proximity to London Luton Airport.
- 2.36 The initiative will be a key future economic driver for the town and borough in terms of maintaining a high degree of self-containment and reducing levels of out-commuting, safeguarding Maylands Business Park as a sub-regionally important employment centre, and creating new jobs and generating prosperity. It will also seek to encourage more sustainable travel to work movements linked to the wider transport improvements for the Hemel growth areas, upgrading of the digital network, and a strong commitment to sustainable development.

3. What is the Local Context?

3.1 The development strategy has been developed in the light of a number of key and overlapping local constraints and these include:

- the Growth and Infrastructure Strategy;
- meeting development needs;
- delivering supporting infrastructure;
- settlement hierarchy;
- sustainable development / responding to climate change; and
- environmental and planning constraints.

3.2 These factors are explained in more detail in the relevant topic papers but are summarised below.

a) Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050 (G&IS)

3.3 The “Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050” (G&IS)¹ has helped shape the vision in the emerging Local Plan.

3.4 The Strategy has informed the early stages of developing the spatial objectives for the consultation draft (Emerging Strategy for Growth) Local Plan. It outlines the long term visions for the Borough to 2050, guides how the Council can meet the challenges and opportunities of future growth, and cover six over-arching themes:

- Building Dacorum’s future homes for everyone.
- Generating a vibrant economy with opportunities for all.
- A happier, healthier and safer Dacorum.
- Creating a clean, green and attractive Dacorum.
- On-track for a better transport network.
- Harnessing the opportunity of technology and digital connectivity

3.5 The G&IS sets out key challenges, proposals and related visions under each theme. It also explains how the Council will work with the local community and key partner organisations to deliver the proposals and visions.

3.6 The strategy is clear that the main driver of change is the accelerated delivery of new housing and that this will be a central component in the strategy for Dacorum’s future. The G&IS notes that housing growth will be significant compared to historic rates. It takes a positive view to the benefits growth can bring to the borough. Key proposals include:

- Progressing the draft Local Plan and policies in support of delivering new homes, maximising the use of brownfield land and urban densities, and delivering genuinely affordable homes.

¹ <http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-growth-and-infratstructure-strategy-to-2050.pdf>

- Supporting regeneration of the Hemel Hempstead Town Centre and Two Waters Area.
- Working to deliver the Joint Strategic Plan.
- Working with St Albans City and District and the Crown Estate to develop a master plan (of 11,000 homes) for Hemel Garden Communities.
- Preparing an Infrastructure Delivery Plan needed to support growth and improved transport.
- Growing the local economy to encourage more investment, to deliver more and varied jobs, and to fuel the development of new roads and transport infrastructure.
- Promoting Dacorum as a prime location for inward investment.
- Ensuring a healthy supply of land for businesses and employers.
- Working with the Hertfordshire Innovation Quarter to secure new high quality employment opportunities, particularly in the enviro-tech sector.
- Supporting the economy to regenerate and improve the town centres.
- Delivering a major programme of new council housing and working closely with Housing Associations to meet the housing needs of the Borough.

b) Meeting development needs

- 3.7 The development strategy must take into account how it will accommodate the Borough's identified development needs over the lifetime of the Plan. The main drivers will be land for housing, employment and retailing. The Council is committed to meeting its own development needs as far as constraints and other factors will allow and recognising the fundamental challenges it raises for the borough.
- 3.8 Chapters 6 of the Housing topic paper explains that the Council will be using an annual housing need figure in the Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth of 922 homes per annum (i.e. 16,596 over the lifetime of the Plan) rather than the identified local housing need figure of 1,023 homes per annum in the Local Housing Needs Assessment. This follows proposed draft changes to the national standard method for calculating housing need. This is significantly above that in the current Core Strategy housing target of 430 homes per annum.
- 3.9 The Housing Topic Paper then goes on to say that the Government wishes to replace the standard method with a nationally-prescribed approach for setting "binding" local housing requirements in Local Plans. This will take into account both housing need in an area (under what the standard method currently provides for) and relative constraints (or lack of).
- 3.10 Taking into account our employment evidence base forecasts, the consultation draft Local Plan is aiming to secure 116,500 sqm of industrial and warehouse floorspace while stabilising from the mid-term onwards the future net loss of office space. Our analysis suggests that it is not possible to find land for all of this floorspace, and some of this unmet need may have to be accommodated on a cross-boundary basis.

3.11 While our retail studies do forecast increases in future floorspace, the consultation draft Local Plan does not set a target as such. Rather it seeks to facilitate a substantial increase in convenience space in support of the Borough's retail centres and new growth locations. The Retail topic paper explains how these requirements are being met spatially.

c) Delivering supporting infrastructure

3.12 The Council's view is that growth should be of a sufficient "critical mass" in order to ensure key infrastructure (e.g. a secondary school) can be secured for that settlement and that it is delivered in a sustainable way. Larger, new developments create the greatest opportunity to design in the infrastructure and facilities from the outset, to secure its delivery, and to release capacity to support future growth, particularly in terms of the wider benefits it brings to the settlement as a whole.

3.13 The scale and location of growth is also vital to supporting the regeneration and vitality of settlements. For example, a key objective of the Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth is supporting the continuing regeneration of Hemel Hempstead's aging New Town infrastructure and its transition towards a Garden Town status (see paras. 4.35-4.45).

3.14 It should also help increase the range of social, leisure and cultural facilities, which are currently quite low for the size of the population. Key local requirements will be securing new schools, supporting a shift towards non-car transport, delivering local health and community facilities, and securing new open space and other green infrastructure.

3.15 The interim Infrastructure Delivery Plan (IDP) will set out the infrastructure requirements, cost, timing, potential funding mechanisms and responsibilities for delivery (see paras. 4.57-4.67).

d) Settlement hierarchy

3.16 The Borough comprises of a mix of towns, large villages and smaller settlements. The spread and nature of the Borough's settlements will continue to dictate spatial options that seek to optimise previously developed land, deliver urban extensions in the more sustainable locations, and to prioritise regeneration opportunities.

3.17 Historically, growth has been prioritised according to the scale and nature of settlements. The Council has developed a settlement hierarchy in order to ensure that new development takes place in suitable locations that have the best access to a wide range of services, facilities and employment opportunities. The Settlement Hierarchy study did not point to any change to how settlements function and the services they support to justify fundamentally altering this broad approach. Thus, spatially, priority will continue to be given to meeting development needs in the larger settlements bearing in mind their character, opportunities and constraints. Conversely, the Council sees a limited

role for the smaller settlements given their greater constraints and sensitivities, and limited capacity/scope of services.

- 3.18 Table 3.1 shows net housing completions by settlement over the period 2006-19. This highlights that the bulk of new homes are being delivered in the three towns and three larger villages in accordance with a broad settlement hierarchy. Clearly Hemel Hempstead dominates, followed by the two market towns of Berkhamsted and Tring, and then the larger villages (albeit proportions vary). A similar picture emerges for commitments (Table 3.2).

Table 3.1: Summary of (net) housing completions by settlement 2006-19

Settlement	Total housing stock in Borough (as at 2019)*	% of total housing stock in Borough	No. of (net) homes)	% of total housing programme
Hemel Hempstead	39,350	61.0	4,150	71.1
Berkhamsted (inc. Northchurch)	9,430	14.6	805	13.8
Tring	5,320	8.3	286	4.9
Bovingdon	2,250	3.5	35	0.6
Kings Langley	2,190	3.4	68	1.2
Markyate	1,400	2.2	159	2.7
Rest of Dacorum	4,530	7.0	335	5.7
Total	64,570	100	5,838	100

Source: DBC monitoring

* VOA 2019 housing stock data

Table 3.2: Summary of housing commitments by settlement as at 1st April 2019

Settlement	No. of (net) homes)	% of total
Hemel Hempstead	2,493	77.4
Berkhamsted (inc. Northchurch)	95	3.0
Tring	325	10.1
Bovingdon	32	1.0
Kings Langley	6	0.2
Markyate	9	0.30
Rest of Dacorum	259	8.0
Total	3,222	100

Source: DBC monitoring

- 3.19 Table 3.3 shows the equivalent proposed housing as reflected in the preferred development strategy.

Table 3.3: Summary of proposed housing development by settlement

Category	Settlement	Amount of housing development
Strategic Settlement	Hemel Hempstead	10,688
Market Towns	Berkhamsted	2,236
	Tring	2,731
Large Villages	Bovingdon	241
	Kings Langley	274
	Markyate	215
Selected Small Villages, other small villages and the countryside	-	514

e) Delivering sustainable forms of development / responding to climate change

3.20 Achieving sustainable development is at the heart of the NPPF. Therefore, the Plan must ensure that growth and development needs are delivered sustainably taking into account the constraints and opportunities of the Borough. In addition, the Council has declared a climate emergency²

3.21 While sustainable development and climate mitigation has implications at all spatial levels, at a higher-level and in terms of the development strategy this would cover:

- Ensuring development needs are met and directed to more sustainable locations;
- Planning for new buildings in the most accessible locations so as to reduce car dependency and promote non-car transport solutions;
- Considering the benefits of larger-scale development and greater opportunities to secure more sustainable form of development (e.g. minimising energy use, greater scope for renewable energy technologies, decentralised heating and support for public transport, etc.);
- Locating development to avoid harm to environmental assets and away from flood risk and land contamination.

f) Environmental and planning constraints

3.22 The nature of spatial options realistically available to the Council continues to be heavily restricted by the Borough's varied environmental and planning constraints. These limit choices with regards to the scale and location of new development.

3.23 The Borough is subject to a range of key constraints including:

- the Green Belt
- the Rural Area beyond the Green Belt
- Chilterns AONB
- Chiltern Beechwoods Special Area of Conservation (SAC)/SSSI

² <http://www.dacorum.gov.uk/home/environment-street-care/climate-change>

- Areas of flood risk

The main designations are set out in Figures 1 and 2 below.

Figure 1 Key constraints in Dacorum

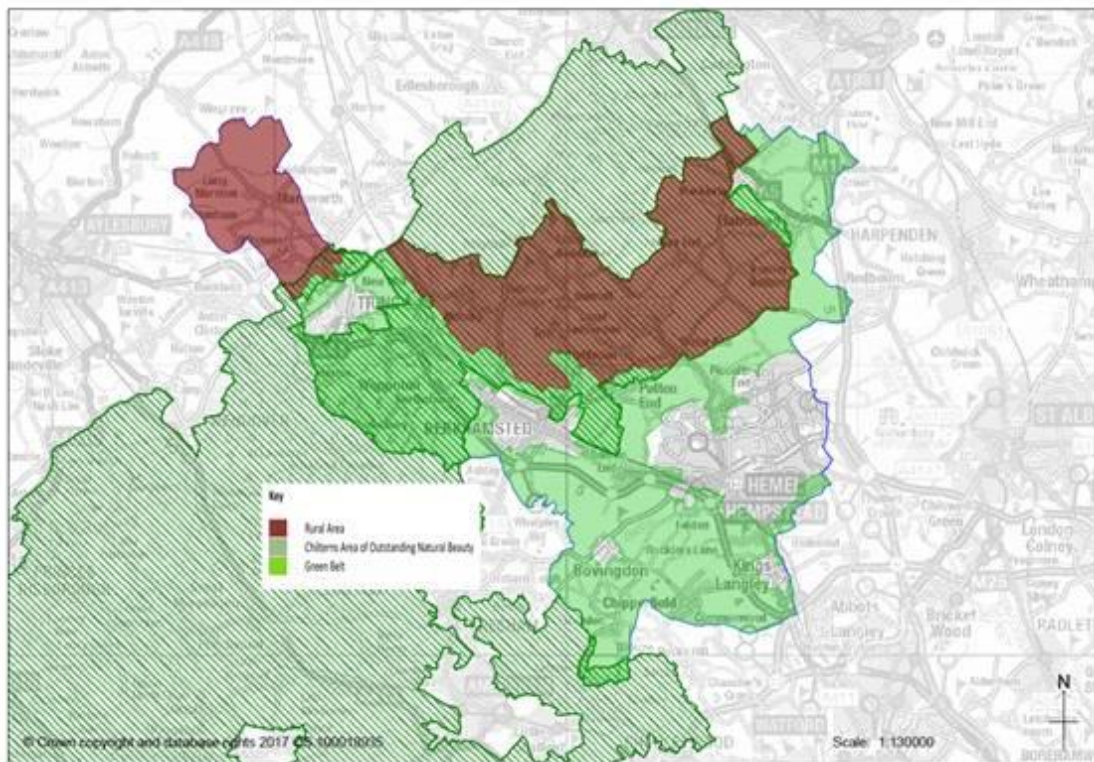
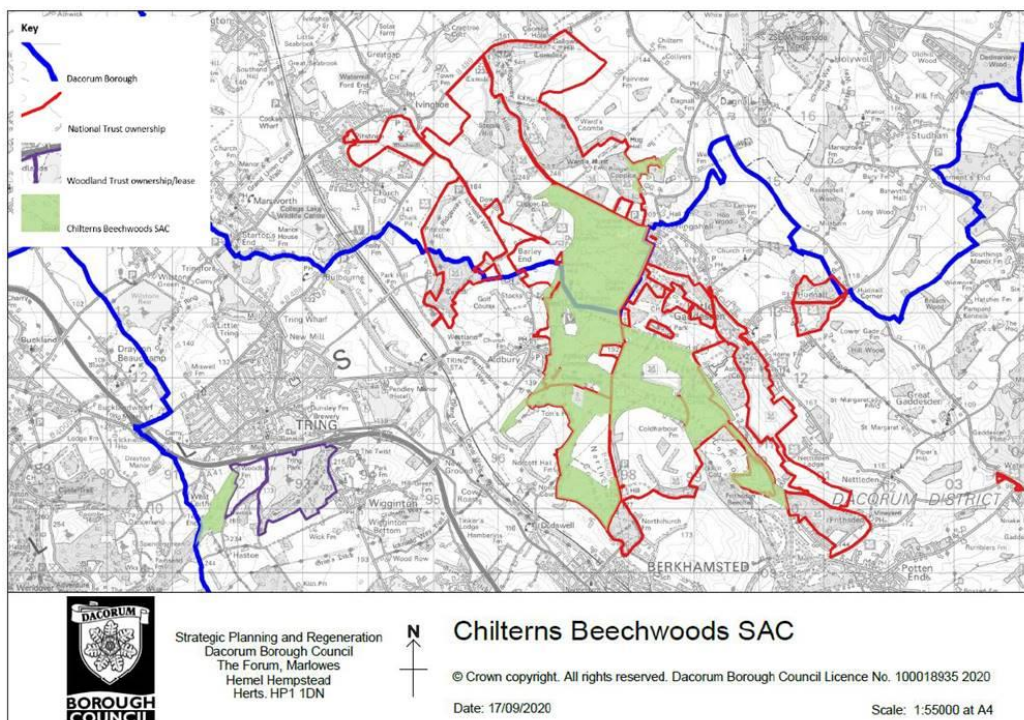
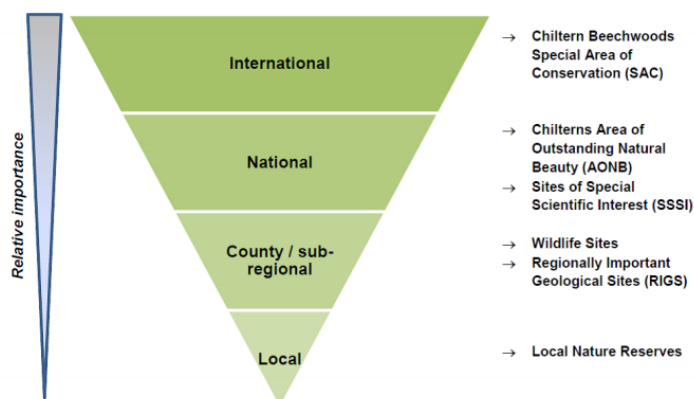


Figure 2 Map of the Chilterns Beechwoods SAC in Dacorum



- 3.24 The Green Belt covers over half of the Borough (10,634 ha) with the Chilterns AONB overlapping and extending beyond it. Therefore, most of the land outside of the key settlements is identified as areas of development restraint. Furthermore, our Stage 2 Green Belt review pointed to only very limited areas of poorly performing Green Belt³. This implies that the Council will have to look to meet some of its development needs in better performing Green Belt areas. These matters are considered in more detail in the Green Belt topic paper. However, the Green Belt will be one of a number of considerations in determining any growth strategy.
- 3.25 The Council has also undertaken a Stage 3 Green Belt review. This has looked at the details of boundaries in relation to the site selection process rather than revisiting the wider performance of Green Belt land.
- 3.26 The Chilterns AONB is nationally recognised landscape of very high quality. It significantly overlays both the Green Belt and Rural Area designations. The Council not only needs to avoid major development within the AONB, but it needs to consider the impact of development on its (often extensive) setting. Furthermore, the recent Glover Review on landscapes only serves to underline the growing importance of managing and resourcing the Chilterns landscape and highlight the potential move towards a National Park status.⁴
- 3.27. The Borough's countryside is also affected by an overlapping hierarchy of environmental designations (see Figure 3). These include the Chiltern Beechwoods Special Areas of Conservation⁵, SSSIs (8 in total), Regionally Important Geological Sites (2 in total), Local Nature Reserves (6 in total), Local Wildlife Sites (over 230), etc. New development should not lead to the loss, harm, and fragmentation of these sensitive environmental assets.

Figure 3 Environmental hierarchy



³Stage 2 Green Belt Review and Landscape Appraisal (January 2016)

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

⁴ Landscapes Review (September 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf

⁵ The designation extends to two areas in the Borough: a larger area covering the Ashridge Estate and a smaller area at Tring Park.

3.28 Government expects Local Planning Authorities to have particular regards to a number of these constraints as they are recognised as NPPF paragraph 11 “Footnote 6” constraints⁶. Paragraph 11b) of the NPPF also makes clear that weight should be given to these areas or assets in considering the scale and location of planned growth:

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

3.29 Designated Special Area for Conservation (SAC) are of international importance for ecology. These SACs and other sites of similar importance are collectively known as “European Sites”. Within the Borough there is one such European Site, the Chilterns Beechwoods. It is a composite of 9 sites each being a SSSI (and 8 of which are in the Chilterns AONB). In Dacorum there are 2 ‘units’ at Ashridge (Ashridge Commons and Woods SSI) and south-west of Tring (Tring Woodlands SSSI). The remaining units are spread across the Chilterns in Berkshire, Buckinghamshire and Oxfordshire and in total cover an area of nearly 1,300 ha. There are also other European Sites within 15km of the Borough within Buckinghamshire (the former districts of Aylesbury Vale and Chiltern and South Bucks).

⁶ In Dacorum these cover SACs, SSSI; the Green Belt, an Area of Outstanding Natural Beauty, irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest); and areas at risk of flooding.

4. How did the strategy evolve?

a) Introduction

- 4.1 This section of the Topic Paper explains how the spatial strategy evolved and some of the key factors that has influenced its development. The identification, assessment and rejection of reasonable alternative options is also another factor in shaping the preferred strategy and this is discussed in chapter 5.

b) Core Strategy

- 4.2 The Core Strategy has been an important starting point for preparing the development strategy. It takes on board the Core Strategy Inspector's conclusions⁷ on the necessity for an early partial review of the Plan and housing need (and ways of meeting that need more fully), the need for a comprehensive review of the Green Belt, and the requirement for joint working with St. Albans. This is explained in paragraph 29.10 of the Core Strategy:

“Through the partial review, the Council will assess:

- a) household projections;
- b) the role and function of the Green Belt affecting Dacorum, including long term boundaries and the potential to identify safeguarded land beyond 2031; and more significantly,
- c) the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum. This element will include St Albans district and relevant areas lying beyond the Green Belt.”

The Council has taken these points into account in preparing the technical studies underpinning the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth, in progressing Duty to Co-operate discussions with St Albans district, and through work on the Hemel Garden Communities programme.

c) First Draft of the Issues and Options Local Plan

- 4.3 It is worth noting for completeness that the Issues and Options (I&O) Plan was originally meant to have been reported to Cabinet at the end of September 2017, but was deferred⁸. At the time, it put forward a “suggested option” (Option 2C) to housing growth and distribution using a housing need figure of 756 homes per annum (17,388 homes in total to 2036). The latter was based on the 2016 South West Hertfordshire Strategic Housing Market Assessment⁹. Growth was to have been spread around the Borough to the larger settlements, with the main focus being on the towns.

- 4.4 However, the Government released its consultation in mid-September 2017 (“Planning for the right homes in the right places”) on a proposed new national

⁷ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/inspector's-report-on-dacorum's-core-strategy-july-2013.pdf?sfvrsn=5cc4eb9f_0

⁸ <https://democracy.dacorum.gov.uk/ieListDocuments.aspx?CId=157&MId=1359>

⁹

standard method for calculating housing need. This new standard formula suggested both a potentially much lower (602 homes per annum) and higher “uncapped” (c.1,100 homes per annum) figures for Dacorum. On this basis, we did not consider it appropriate at that stage to proceed with any early preferred option to growth and distribution in the I&O Plan. Therefore, we removed reference to the suggested option in the subsequent draft Plan (see point d) below), although this did not affect the bulk of its content.

d) Local Plan Issues and Options Consultation November 2017

- 4.5 The Council undertook an Issues and Options consultation on its initial draft of the Plan¹⁰ during November-December 2017. In order to secure more meaningful responses this version of the Plan presented a full and detailed set of policy options, particularly in respect of housing growth and distribution. This has helped inform and develop the Local Plan. This stage also involved a Call for Sites exercise for new development.
- 4.6 This section of the document provides a brief summary of the main issues arising from that stage, and the responses to these. The Council received a total of 22,708 responses to 46 questions from 2,376 individuals and organisations. A full summary of the consultation material and the responses are available from the Council’s website¹¹.
- 4.7 The Issues and Options Local Plan consultation gave extensive coverage to housing and growth matters followed by a series of related questions. This involved discussions over:
- how new development could be distributed. (Question 8)
 - the future role of the Green Belt in meeting housing need. (Question 9)
 - selecting development sites. (Question 11)
 - the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market Assessment. (Question 15)
 - calculating housing need. (Question 16)
 - the proposed approach to the timing of site delivery. (Question 19)
 - what appropriate levels of housing growth should be considered. (Question 33-35)
 - identifying suitable locational principles. (Question 36)
 - how future growth should be distributed. (Question 37-38)
 - potential growth options. (Question 39-45)
 - suitability of sites (Question 46)
- 4.8 The Issues and Options Local Plan sought feedback on three potential and successively increasing options to use as a starting point for setting the housing target in the draft Local Plan:

¹⁰ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/local-plan---issues-and-options--consultation-final---13-november-2017.pdf?sfvrsn=841e329e_21

¹¹ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

Option	No. of homes pa	Comments
Option 1: lower draft Government figure	602	The Government's draft figure based on the standard methodology for a plan less than 5 years old.
Option 2: Locally assessed need	756	Based on the conclusions of the 2016 South West Herts Strategic Housing Market Assessment
Option 3: upper draft Government figure	1,000-1,100	The Government's draft figure based on the standard methodology for a plan more than 5 years old.

4.9 The Issues and Options Local Plan explained the implications of each of these options and also rejected other options above and below these figures (see Appendix B to the consultation Local Plan for a detailed discussion on this). It then applied the options to 7 different spatial scenarios explored under Questions 39-45.

4.10 The Issues and Options Local Plan (paragraphs 10.21-10.2.4) put forward suggested locational principles to assist in decisions on choosing growth locations. These covered a number of high-level matters including:

Locational Principles:

- Maximise the use of brownfield land for development.
- Maximise the density of development, whilst ensuring it reflects local character.
- Support urban regeneration – particularly of Hemel Hempstead new town.
- Avoid areas at high risk of flooding.
- Respect the character of the existing settlement pattern and restrict urban sprawl.
- Protect the character and value of important landscapes, heritage and biodiversity.
- Ensure that new development can be served by necessary infrastructure.
- Locate development to help support delivery of a 5 year housing land supply, as required by Government.

4.11 Such principles have helped to shape broad approaches to growth locations.

4.12 Section 10.3 of the document dealt with a number of ways to distribute this growth with the aim of directing new development towards the more sustainable locations in the borough. Three main approaches were suggested that looked at both their pros and cons:

Distribution	Main approach
A – Focus on three towns	Concentrate new development at Hemel Hempstead, Berkhamsted and Tring. Hemel would have the greatest potential to accommodate new growth. Lower level of growth directed to the secondary towns.
B – Greater focus at Hemel Hempstead	Continues historic growth pattern of development in Hemel Hempstead as a New Town. Hemel Hempstead is the principal town which has the greatest range of jobs, services and facilities.
C – Spread more evenly across the Borough	Accommodating future growth is shared across the towns and three large villages.

4.13 The Issues and Options Local Plan also set out several other options for distribution that it felt should be rejected:

- New settlement (town or village);
- Rural growth;
- Export growth to another Council area;
- Use greenfield land before brownfield land; and
- Significant expansion of a large village.

Appendix C in the document explained why these growth distributions were rejected. The Council considers that there continues to be strong grounds not to pursue these options (see chapter 5).

e) Responses to the draft (Issues and Options) Local Plan (Reg. 18) Consultation

4.14 From the substantial number of responses received the summary of responses document identified a number of housing and growth-related themes:

- The Council had not fully assessed urban capacity and made decisions about underused spaces throughout its towns, including Hemel Hempstead.
- The approach to development in the Green Belt and the steps to be taken to assess future development sites. It was felt that a further assessment would be required on Green Belt sites before identifying preferred options
- The extent to which infrastructure assessments have fed into the Plan. Of particular importance was the need for schools and healthcare facilities.
- The impact that development would have on the Chilterns Beechwoods from growth in Dacorum and in adjoining authorities.
- Water availability (including wastewater, drainage and other utility provision) and the capacity required to meet the needs arising from new development.

- The need for environmental standards in all housing (new build and existing) to be set at the highest level to minimise environmental impacts and reduce/minimise carbon emissions.
 - Developer contributions should be secured to support development either through Section 106 agreements or through CIL. It was identified that there are existing infrastructure deficits across the Borough that should be address
- 4.15 By far the largest number of responses received were concerned with housing growth and associated matters. As a consequence, comments were often cross-cutting across the Issues and Options Plan. The public and resident action groups strongly objected to a variety of levels of housing growth and its implications on a number of grounds. However, public and private organisations adopted a more mixed view to such matters, and there was a degree of support expressed for taking proactive steps to accommodate growth. Unsurprisingly, the development industry tended to be by far the most positive over growth, often linked to promotion of their individual sites.
- 4.16 A summary of the main issues arising from each question or group of related questions that had a bearing on housing growth delivery and distribution is set out in Appendix 1.
- 4.17 Given the number of options and the amount and varied nature of the comments they generated, it was difficult for the Council to understand whether there was any clear preference for a spatial distribution. Respondents in theory could object and support to all options.
- 4.18 Most of the responses were linked to earlier comments over individual's support for particular levels of growth and how this was to be accommodated. Again residents tended to favour distributions associated with lower growth levels (many could not even support this) that were seen as having less impacts on the Green Belt and the character and the carrying capacity of settlements. Whereas, the development industry were more likely to support the opposite approach. Organisations based outside of Hemel Hempstead tended to favour concentrating development there, especially where it could support urban regeneration along with affordable housing in areas where employment was available.
- 4.19 Those who supported lower growth levels repeated arguments for minimising Green Belt releases, avoiding the merger of settlements, focusing on urban capacity, infrastructure shortfalls, meeting needs outside the Borough, etc. The CCB preferred the lower of the options that focussed growth at Hemel Hempstead (i.e. Option 1B). It was seen as having the least adverse impact on the Chilterns AONB and its setting. Chiltern and South Bucks (now part of unitary Buckingham Council) tended to raise greater concerns over higher growth levels where focussed outside of Hemel Hempstead.
- 4.20 Many who preferred higher growth felt that Option 2A better met assessed need and they favoured concentrating this at the three towns. These settlements were seen as being able to accommodate growth and deliver infrastructure. Some

developers argued that option 3 would be more appropriate due to changes in the Government standard methodology.

4.21 A small number of respondents argued that there should be opportunities for the more rural settlements to provide some housing growth to ensure they remain vibrant/viable. Hertfordshire County Council expressed no strong preference (from a transport perspective) but supported proposals to focus on the three main towns, and some development in the smaller settlements to help support rural bus services. Interestingly, Luton Airport was against proposals for development in Markyate as they have a duty to limit the number of people living in areas affected by aircraft noise.

f) The Green Belt

4.22 Green Belt issues are dealt with in more detail in the Green Belt topic paper. Clearly, developers and landowners have continued to promote land on the edge of settlements and in the wider countryside for housing throughout the Plan process, particularly Green Belt land. However, the use of such land for housing has proved unpopular with local residents and other organisations (e.g. CPRE), as reflected in representations to the Issues and Options stage of the Plan.

4.23 The Council is also having to balance key national imperatives to boost overall housing supply and to deliver sustainable housing and other development needs, alongside maintaining, as far as is possible, established Green Belts.

4.24 Dacorum is highly constrained by the Green Belt. This means that any development strategy that involves any outward expansion of the towns and larger villages will inevitably necessitate the release of Green Belt land. The Council has had regards to the NPPF (paragraphs 137 – 139) concerning exceptional circumstances and associated factors it must take into account, but has concluded that it needs to release land from the Green Belt to meet its development needs. Urban capacity is not sufficient to satisfy the housing need figure (of 922 homes per annum) and it has considered and rejected a number of reasonable alternatives (see chapter 5).

4.25 The Council has commissioned a series of Green Belt reviews to help inform decisions on the location of growth and preferred sites through the site selection process (see the Site Selection topic paper). The commissioning of a comprehensive Green Belt assessment for Dacorum was also a specific requirement of the Core Strategy Examination Inspector and one that is reflected in the Core Strategy (paragraph 4.4 above). Three reviews have been undertaken as follows:

- Green Belt Review Purposes Assessment – Final Report (November 2013)
- Stage 2 Green Belt Review and Landscape Appraisal Report January 2016 (Published December 2016)
- Stage 3 Green Belt Review – Final Report (August 2020)

These are summarised in Appendix 2.

- 4.26 Each review represented an increasingly finer grained focus on Green Belt boundaries and landscape constraints. Neither Stage 1 nor 2 of these studies made any recommendations as to potential growth scenarios. Nevertheless, they have helped steer the Council's decisions about the most appropriate locations for planned growth in the Borough by helping us to better understand constraints and opportunities for development, and its implications for the wider Green Belt and detailed boundaries.
- 4.27 The stage 1 and 2 reviews identifies that most of the land is essential Green Belt and is necessary to be retained. In particular, when this is combined with heritage and ecological assets, along with major flooding constraints, a significant proportion of the Green Belt in the Borough has an absolute constraint against development. This means that there are very few lesser performing sub-areas of Green Belt in Dacorum.
- 4.28 Given the overall level of development need and other factors, we conclude that exceptional circumstances exist for releasing Green Belt land over the Plan period. In particular, if the housing need is to be fully met, then there is no alternative other than to remove some land from the Green Belt.
- 4.29 The preferred strategy in chapter 6, as far as possible, utilises those areas of Green Belt which our evidence shows do not strongly satisfy all of the Government's criteria for designation. However, it has also had to balance out other factors to help determine settlement growth. This has been further refined through a comparative selection of sites as detailed in the Site Selection topic paper.
- 4.30 Given the significant scale of development needs that we are seeking to accommodate and the limited number of lesser performing areas identified, we have had to turn to land where development will be more harmful to the Green Belt. In such cases, our decisions over their locations has been based on carefully weighing up their comparative sustainability, suitability and deliverability for development.
- 4.31 Where releases of essential Green Belt are proposed, these are in sustainable locations and could help deliver a range of benefits not just for new residents, but for the wider local community. Further community benefits could also accrue as the NPPF (paragraphs 138 and 141) expects us to seek compensatory improvements to the environmental quality and accessibility of the remaining Green Belt, if land is released for development. This could cover outdoor sport and recreation, better footpath links, improvements to landscapes and biodiversity, etc.
- 4.32 The Council has carefully assessed the release of Green Belt land, and is satisfied that the choice of growth locations in the emerging development strategy does constitute planned growth. It will not lead to unrestricted sprawl and will generally avoid unacceptable encroachments into the countryside. Moreover, they will not result in any of the neighbouring towns or villages

merging. We are also confident that defensible and permanent boundaries can be created adjacent to the retained Green Belt.

- 4.33 A number of the growth locations are of a substantial size and nature to allow space and opportunity to manage change. Potentially they provide for good levels of mitigation measures in terms of the harm to the visual openness of the Green Belt and to also compensate for other landscape and heritage impacts.
- 4.34 However, it should be noted that detailed development areas have not been defined in all cases. This will affect the extent of land actually released from the Green Belt and decisions over future defensible boundaries and levels of mitigation and compensation achievable.

g) Hemel Garden Communities/Hemel Garden Town

- 4.35 The Government is supporting a programme of “Garden Communities” across the country that will provide large scale new housing, infrastructure, green spaces, jobs and services in sustainable settlements. A number of Garden Towns and Garden Villages have recently been designated for funding and support. The Government sees this project as an important initiative for delivering growth, and regeneration, and their commitment to boosting overall housing supply. Indeed, national policy (para. 72 of the NPPF) is supportive of the principle of larger scale development, such as new settlements or significant extensions to existing villages and towns.
- 4.36 The Council has been working closely with St Albans City and District Council, Hertfordshire County Council, Hertfordshire Local Enterprise Partnership and The Crown Estate to explore the benefits of delivering a proposed major urban extension for a mixed-use residential and commercial development to the east and the north of Hemel Hempstead, as a garden community. The partners also recognise the importance of this ambitious project in terms of its transformational effects on Hemel Hempstead and in securing much needed long-term investment in and rejuvenation of the fabric of the New Town.
- 4.37 The partners are taking forward the initiative as the Hemel Garden Communities (HGC). They have developed a Charter¹² that provides a strategic framework for the planning, delivery and long-term stewardship of the HGC and that also ensure the town-wide benefits of the scheme. The vision for the HGC is underpinned by 9 place-making principles based on the Town and County Planning Association (TCPA) Garden City Principles.
- 4.38 The partners have been successful in securing funding from the Ministry of Housing, Communities and Local Government (MHCLG) to move the project forward, including Garden Town status for Hemel Hempstead. The HGC is now accepted on to the Garden Communities programme, alongside being awarded £750,000 from the MHCLG to help accelerate delivery of the scheme. The

¹² Hemel Garden Communities Charter (November 2018) <http://www.dacorum.gov.uk/docs/default-source/strategic-planning/hemel-garden-communities-charter.pdf>

funding will help initiate infrastructure studies and support resources to help bring the project forward.

4.39 The HGC Partnership will use the funding to help accelerate the delivery of:

- High quality designed, mixed-use residential development providing around 11,000 new homes for the area.
- A significant boost to the local economy through the delivery of 10,000 new jobs, including a new Enviro-Tech based Enterprise Zone to the east, called the Hertfordshire Innovation Quarter
- Major improvements to existing infrastructure alongside new sustainable infrastructure delivery.
- A number of key strategies and supporting technical studies.

4.40 The HGC Partnership are committed to supporting the project. A management board is in place (the Hemel Garden Communities Delivery Board (HGCDB)) to help guide the place-making design, engagement and delivery aspirations, and to ensure a strong commitment to collaborate on strategic issues.

4.41 The HGC will be underpinned by a series of policy documents being developed to support delivery of the Garden Town including:

- Memorandum of Understanding between the key partners.
- Town and Country Planning Association (TCPA) Garden City and HGC Charter principles.
- Transformational Plan.
- Hemel Garden Communities Masterplan.
- Hemel Hempstead Sustainable Transport Plan.

4.42 These emerging plans will help secure alignment of overall objectives for the HGC and social, economic and environmental improvements for the town as a whole. Additionally, it will ensure a consistent approach across local authority boundaries in terms of place-making, transport, employment and infrastructure, etc.

4.43 In its new role as a 'Garden Town' Hemel Hempstead will be pivotal in delivering transformational change and renewal of the town, economic prosperity, and the wider growth ambitions for the borough. This will chiefly be achieved through the Hemel Gardens Communities (HGC) programme and supported by corresponding opportunities for change elsewhere in the town. Therefore, the HGC will form a major component of growth underpinning the preferred development strategy.

4.44 Through the delivery of the HGC programme and other linked town-wide objectives the town will be a focus for:

- Meeting the bulk of the borough's development needs, particularly in terms of market and affordable housing, and new employment land.

- Maintaining Hemel Hempstead as a key employment centre and self-sustaining economy.
- Ensuring transformational change and renewal of the town.
- Supporting Hemel Hempstead town centre's role as a sub-regional centre.
- Delivering a network of integrated and walkable neighbourhoods within a strong landscape setting.
- Improving connectivity across the town and supporting a modal shift away from the private car, including investing in multi-modal transport infrastructure, and enhancing the local network of footpaths and cycle routes.
- Securing new and upgrading existing physical and community infrastructure, including the creation of a network of new green spaces.

4.45 The HGC programme is not only important during the lifetime of the Plan but beyond. The scale of development is such that not all of the Hemel growth areas can be delivered by 2038. This implies the importance of providing a framework to ensure future delivery of much longer-term housing and employment growth to 2050. The HGC offers scope to secure a further 4,000 homes post 2038 as part of safeguarded land. On this basis, the preferred development strategy needs to reflect the importance of the long-term planning and coordination of the HGC (subject to future reviews of the respective local plans of Dacorum and St Albans district).

h) Duty to Cooperate / Engagement with key stakeholders

4.46 The Council has followed an iterative approach to developing the spatial strategy. The strategy continues to be informed and refined by a wide range of technical evidence as well as by both formal and informal engagement. The latter includes key stakeholders such as utility providers, health authorities, and other technical and environmental bodies.

4.47 We continue to engage on cross-boundary and strategic matters under the Duty to Co-operate with a variety of key organisations. This includes Hertfordshire County Council (on school, environmental and highways matters, etc.), adjoining and nearby authorities, and other statutory bodies such as the Environment Agency, Natural England and Historic England. Where we have reached agreement on matters, we will be preparing a series of Statements of Common Ground with relevant organisations for the next stage of the draft Local Plan.

i) Sustainability Appraisals

4.48 The Sustainability Appraisals (SA) is a decision aiding tool rather than a decision making one. It is part of a number of strands of evidence to help inform the Council's approach to the amount and distribution of growth.

4.49 The SA is an iterative assessment to allow conclusions to feed into each step of the Plan. The SA has ensured that policy contributes towards sustainable development principles through the SA objectives identified. All the Council's SA work has been undertaken by consultants TRL.

- 4.50 The Council's broad spatial strategy approach is to direct growth to existing urban areas, where there are good facilities and public transport opportunities, and to conversely limit development in less accessible areas. This is consistent with the overarching aim of the NPPF to achieve sustainable development. The approach has been derived from the process of the Sustainability Appraisal (SA) undertaken in parallel with the preparation of the Plan.
- 4.51 TRL undertook an SA of the draft (Issues and Options) Local Plan covering:
- The Issues and Options Plan, and
 - The Schedule of Site Appraisals.

Rather than a full SA Report, this plan was accompanied by a Sustainability Appraisal Working Note¹³ given its high-level nature. The Working Note assessed the potential social, economic and environmental implications of a variety of plan objectives and options put forward in the Issues and Options Plan.

Working Note (October 2017) for the Issues and Options Plan

- 4.52 The Working Note of the Issues and Options Plan details the reasonable alternatives which were appraised against SA objectives alongside the policies proposed for inclusion in the Issue and Options Local Plan across seven topics areas. It appraised a low, medium and high alternative growth levels and applied these to three different spatial scenarios based on various combinations of housing development (that also included sub-options). In all, seven sub options were appraised (see paragraphs 4.8-4.13 above). The Working Note also considered a number of the alternatives scenarios that were rejected.
- 4.53 The Working Note warned that undertaking the high level assessments on multi-dimensional options meant that there was large amount of uncertainty relating to the prediction of the likely effects against the SA/SEA. It also stressed that the role of the SA/SEA was to provide assessments of the reasonable alternatives being considered (not every possible alternative needs to be assessed), rather than to make the decision as to which alternatives should or should not be taken forward or to necessarily identify 'reasonable alternatives'.
- 4.54 In terms of the growth options scenarios, the Working Note acknowledged the difficulties of separating out the differences in effects of a number of the related spatial sub options. However, the report was able to broadly conclude that the lower of the three levels of growth proposed (under Option 1) would result in less adverse effects on the environment when compared with the higher levels of growth under Options 2 and 3. Option 3, which proposes the highest level of growth, was identified as resulting in the greatest level of adverse environmental effects. The levels under Option 2 would have levels of effects on the environment greater than Option 1, but lower than Option 3.

¹³ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-issues-and-options-sa-working-note---october-2017.pdf?sfvrsn=66ad339e_4

- 4.55 However, the report pointed out that high levels of growth need not lead to negative effects on the SA objectives. In terms of the social and economic SA objectives, broadly the higher level of growth performed the best as it would result in housing levels that would provide a number and range of homes to meet future needs of the Borough, particularly in relation to affordable housing. As a result significant positive effects have been identified for Option 3 in relation to the 'housing' SA objective.
- 4.56 The discounted growth levels and distribution options (i.e. respectively Appendix B and C in the Issues and Options Plan) that the Council had ruled out from being 'reasonable alternatives' also formed part of the assessment under the SA/SEA process. The Working Note agreed with the Council reasons in each case i.e. that these were not 'reasonable alternatives' that should be considered further in the SA/SEA and plan making processes.

Working Note (October 2017) for the Schedule of Site Appraisals

- 4.57 An appraisal was also undertaken of the Schedule of Site Appraisals that accompanied the draft (Issues and Options) Local Plan (Schedule of Site Appraisals Sustainability Appraisal Working Note (October 2017)¹⁴). The Schedule of Site Appraisals was an initial high-level constraints-based approach to assessing a number of potential allocations, chiefly greenfield rural locations, that were promoted to the Council at that stage).
- 4.58 The Working Note made clear that it simply provided a detailed commentary and scoring of these sites against the SA objectives. Thus it did not expressly recommend which sites to take forward to the next stage of the draft Local Plan.

Working Note (November 2020) to the Dacorum Local Plan (2020-38) Emerging Strategy for Growth

- 4.59 TRL have produced a Working Note for this Plan which has been informed by the earlier round of consultation and updated and reviewed in light of comments received at that stage. The
- 4.60 The Working Note considered a number of revised spatial options and took into account the latest growth levels, as measured against 922 homes per annum. In reality, there were limited variations between these options. It concluded that greenfield development would lead to the potential for adverse effects, worsening with the highest growth level considered (at 1,100 homes per annum) (Option E). However, it also recognised in many cases that there was scope for mitigation measures and that other benefits could accrue. Furthermore, the Working note identified a significant positive effects for Option E in terms of the social and economic SA objectives, particularly in relation to the 'housing' and its ability to deliver more affordable homes.

¹⁴ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-schedule-of-site-appraisals-sa-working-no/te---october-2017.pdf?sfvrsn=2ad339e_4

4.61 It is worth noting that a number of the options which would require the higher levels of growth in the three main towns (Options A, B and Ci) scored well against the ‘sustainable locations’ objective, Option Ci being that aligned to the preferred strategy.

4.62 The following table presents a summary of interim SA findings from the latest Working Note:

Table 4.1: Summary of Assessment of Spatial Strategy and Growth Options

Significance Assessment	Description
✓✓	Very sustainable - Option is likely to contribute significantly to the SA objective
✓	Sustainable - Option is likely to contribute in some way to the SA objective
?	Uncertain – It is uncertain how or if the Option impacts on the SA objective
-	Neutral – Option is unlikely to impact on the SA objective
x	Unsustainable – Option is likely to have minor adverse impacts on the SA objective
xx	Very unsustainable – Option is likely to have significant adverse impacts on the SA objective

Option	SA Objectives														
	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
Option A	x/? ✓	x	-	x ?	x	x	x	?	x	✓ ?	✓✓	✓/?	✓/✓✓	✓	✓
Option B	x/? ✓	x	-	x ✓	x	x	x	?	x	✓ ?	✓✓	✓/?	✓/✓✓	✓	✓
Option Ci	x/? ✓	x	-	x ?	x	x	x	?	x	✓ ?	✓✓	✓/?	✓/✓✓	✓	✓
Option Cii	x/? ✓	x	-	x ?	x	x	x	?	x	✓ ?	✓	✓/?	✓/✓✓	✓	✓
Option Di	x/? ✓	x	-	x ?	x	x	x	?	x	✓ ?	✓/?	✓/?	✓/✓✓	✓	✓
Option Dii	x/? ✓	x	-	x ?	x	x	x	?	x	✓ ?	✓/?	✓/?	✓/✓✓	✓	✓
Option E	x/? ✓	x	-	x ?	x	x/xx	x	?	x/xx	✓ ?	✓/?	✓/?	✓✓	✓	✓

4.63 Overall, the Council considers that the Sustainability Appraisal documents clearly show how the overall amount of housing growth and the distribution of that growth across the Borough, as set out in the plan, continue to be appropriately informed by consideration of their likely effects on sustainability objectives.

j) Habitat Regulations Assessment

4.64 The Council is required by legislation to undertake a Habitats Regulations Assessment (HRA) on the Local Plan and its policies, in order to determine whether there may be 'likely significant effects' on European Sites of importance for nature conservation from the Local Plan, either alone or in combination with other plans or projects. It must determine whether they would adversely affect the integrity of those sites.

4.65 The HRA is a separate process from the SA/SEA, although there are links between the two assessments and one will inform the other. We summarise this process below, but more detailed information can be found in the Chilterns Beechwood SAC topic paper.

4.66 At the time the HRA for the Core Strategy and Site Allocations DPD did not identify any likely significant issues for any European protected sites¹⁵. However, it did recognise that the principle impacts on the Chilterns Beechwoods SAC at Ashridge (Ashridge Commons and Woods SSI) and south-west of Tring (Tring Woodlands SSSI) continued to be air pollution and recreation disturbance.

4.67 The Council undertook a screening process to determine whether or not the proposals of the Local Plan will have a significant effect on European protected sites within 15km of the Local Plan Area. It established that an Appropriate Assessment was required to assess the potential impacts of the Local Plan on the Chilterns Beechwoods SAC, alone and in combination with other plans or projects. This concluded that the policies of the Local Plan can be implemented without having an adverse effect on the integrity of the SACs.

4.68 However, the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth is to be subject to a new assessment. This recognises the increased possibility that the levels of growth signalled in the Plan could result in a much greater impact on the Chilterns Beechwoods SAC in terms of recreational disturbance and/or air pollution from traffic in the area.

4.69 The Council has published a Topic Paper setting out how it is progressing this as the Local Plan develops.

4.70 The report concluded that it had not been possible to rule out likely significant effects on the Chilterns Beechwoods SAC resulting from either recreational

¹⁵ http://www.dacorum.gov.uk/docs/default-source/planning-development/strategicplanning-11.09.21-dacorumhraupdate_final.pdf

disturbance and/or air pollution, and an AA is considered necessary. The report also set out the methodology for undertaking the AA.

- 4.71 Following discussions with Natural England, they have identified 'long term wear and tear issues on the site' and agreed that likely significant effects could not be ruled out for recreational pressure or air quality on the Chilterns Beechwoods SAC. Therefore they advise that a precautionary approach should be adopted.
- 4.72 Work is ongoing with the HRA, in partnership with Natural England, The National Trust and Hertfordshire County Council, to inform the final version of the Plan. The Appropriate Assessment will accompany the Submission of the Local Plan. That report will build on the information in the Screening Report, stakeholder consultation and other evidence to be produced by the Council and other emerging Local Plans.
- 4.73 The Council will need to undertake work on site, including an air quality impact assessment and visitor surveys, as well as extensive landowner engagement. We are also likely to have to assess the carrying capacity on existing Green Infrastructure in the Borough (i.e. whether they could cope with more visitors) and seek to quantify how much of an impact the additional homes proposed in the plan is likely to result in on the SAC.

k) Draft Dacorum Infrastructure Delivery Plan

- 4.74 The capacity of the local infrastructure to absorb future growth has proved to be a key concern expressed by local residents during the early consultation of the draft Local Plan. The Council recognises that it must ensure that the strategy is underpinned by a clear understanding of infrastructure needs. The scale and distribution of any growth must be capable of facilitating the timely delivery of necessary infrastructure to ensure, as fully as possible, its impacts can be mitigated.
- 4.75 The Council has undertaken a range of engagements with key organisations on an iterative basis that has helped both inform and refine the developing strategy for growth. This engagement process will continue beyond the current consultation draft Local Plan stage. We also continue to work closely with infrastructure providers and relevant bodies under the Duty to Cooperate process, including Hertfordshire County Council and Highways England.
- 4.76 The Council has carried out a series of stakeholder engagements in September 2019, and May and August 2020 with utility providers and other stakeholders under the South West Hertfordshire Infrastructure Providers meetings. The responses have been informed by and have helped refine our emerging scenarios, as well as forming a key input into the draft Infrastructure Delivery Plan (IDP) work.
- 4.77 The draft IDP is our key evolving evidence base on infrastructure. It provides an assessment of the infrastructure required to support the existing and planned levels of development within the borough up to 2038. The preparation of the IDP is an iterative process as it has been continually updated through discussions

with relevant stakeholders and other technical inputs as emerging growth scenarios were developed and refined.

4.78 The draft IDP is accompanied by an Infrastructure Delivery Schedule for each settlement which sets out the schemes that are currently proposed to take place. It also includes an Infrastructure Business Plan that identifies funding mechanisms and priorities for delivering the proposed infrastructure set out in the IDP including those covered by CIL and S106.

4.79 The County Council are an important body that we are engaging with jointly under the Duty to Co-operate requirements and Strategic Infrastructure Providers meetings. The County Council's Growth and Infrastructure Unit has acted as our liaison across the many county services covering:

- education;
- transport;
- waste;
- adult care;
- youth services;
- libraries;
- fire and rescue.

4.80 The key matters that the strategy has had to particularly focus on are ensuring that there is sufficient school capacity available over the Plan period in the towns and large villages, and making sure that the local transport network can accommodate the level of growth planned in parallel with a modal shift towards more active travel modes. These matters are discussed below.

4.81 The Council has carried out a series of more detailed stakeholder engagements in September 2019, and May and August 2020 with utility providers and other stakeholders under the Strategic Infrastructure Providers meetings. The responses have been informed by and have helped refine our emerging scenarios, as well as forming a key input into the IDP work. More detail can be found in the latter document.

4.82 Work on the Hemel Garden Communities programme to deliver substantial growth to the north and east of the town has also helped inform our knowledge of infrastructure requirements there, some of it being large-scale and having town-wide implications.

4.83 The draft IDP provides us with an understanding of the infrastructure requirements, priorities, timing and funding. Our work to date on infrastructure has not identified any fundamental "showstoppers" to the level of growth proposed, although there are continuing issues that will need addressing, some of which are discussed below.

4.84 We continue to work closely with relevant landowners, developers, and other related infrastructure bodies, to minimise/resolve matters, and acknowledge the on-going need to rigorously test viability on a Plan-wide and site-specific basis to ensure development and infrastructure can be delivered.

I) Education Planning

- 4.85 The County Council has responsibility for education planning in Hertfordshire. They need to ensure that there is sufficient school capacity to meet demand based on regular monitoring of school places, housing development and demographic changes. The County Council produce annual primary school area and secondary area forecasts and related meeting demand documents¹⁶ to help inform decisions on school planning.
- 4.86 The Council has been working closely with the County Council on school planning and growth. They have been advising us throughout on the testing of emerging growth scenarios. We have continued to incorporate their views in preparing the development strategy and have adjusted the scale and location of growth in a number of settlements where it was clear that there was not sufficient capacity or the inability to increase this. Equally, where opportunities allowed, the scale of growth could be geared to deliberately enable the provision of new primary and secondary schools. Our work to date indicates that this can be broadly achieved.
- 4.87 Increasing primary school places proved to be more of an issue with the larger villages, particularly in the case of the practical difficulties of expanding the primary school in Bovingdon. We have had to limit opportunities for expansion in these locations to ensure schooling can accommodate our growth ambitions.
- 4.88 The towns were the most affected by secondary schooling capacity. Pupil yield forecasting indicates either current or growing short to medium-term shortages of school places. Therefore, growth must be of a sufficient scale to support new schooling and, in particular, to allow, wherever possible, direct opportunities for new secondary school provision. However, the Council is working closely with the County Council to resolve the location of new secondary schools in the west of Berkhamsted and to the south of Hemel Hempstead. They have commissioned a secondary school search report for each to assist the process.

m) Transport Planning

- 4.89 We continue to assess the impact of growth on the local and strategic road network through on-going engagement with key organisations, the commissioning of transport studies, through transport modelling and site-specific work with landowners and developers. This is explained in further detail in the Transport topic paper.
- 4.90 The County Council is supporting a sustainable transport led approach to growth in accordance with its Local Transport Plan 4 (LTP4). This means that future transport solutions will not always involve new road-building. Instead, there will be a much greater emphasis on achieving a modal shift away from the private car and towards prioritising sustainable travel modes (e.g. walking, cycling and

¹⁶ https://www.hertfordshire.gov.uk/services/schools-and-education/at-school/school-planning/school-planning.aspx#DynamicJumpMenuManager_1_Anchor_1

public transport). Such an approach is best achieved in the towns which already have in place a better developed network and capacity for this.

4.91 We have reflected this in the development strategy in a number of ways including:

- locating growth so as to minimise the need to travel;
- ensuring growth can support walkable communities and integrated neighbourhoods;
- ensuring new homes and other uses can be brought forward close to and around existing transport hubs;
- supporting improved connectivity between key uses/destinations;
- using growth to secure future investment in public transport and the upgrading of transport infrastructure;
- focusing growth where it can support existing and new opportunities for sustainable transport.

4.92 In support of this change in travel behaviour and the IDP process, the Council and County Council have commissioned several transport studies. These include the Berkhamsted and Tring Sustainable Transport Strategy and the Hemel Hempstead Sustainable Transport Strategy. These identify a package of interventions alongside growth that focus on promoting movements by means other than car. In the case of Hemel Hempstead, the transport strategy additionally identifies four key strategic movement corridors through the town:

- Hemel Hempstead: East-West movement across Hemel Hempstead.
- North and North West Hemel to the town centre.
- South and South East Hemel to the town centre.
- Orbital movements through the planned garden community.

4.93 In addition, the transport work has been supported by the COMET model run. This is a countywide multimodal transport model and is able to predict changes in travel demand for vehicles, buses and rail. It currently covers all A, B, main C roads. We have been testing proposed growth scenarios against these model runs. More information can be obtained in the Transport topic paper.

4.94 Given significant proposed planned growth to the north and east of Hemel Hempstead under the Hemel Garden Communities (HGC) project, work is ongoing to identify and deliver a number of site-specific and town-wide sustainable transport measures. Interim findings indicate the following measures will be needed including:

- priority bus routes such as the East-West Priority Transport (EWPT) corridor along the A414;
- significant improvements to Junction 8 of the M1;
- a network of Multi Modal Transport Interchanges with related services and facilities serving Maylands Business Park and the rest of the town;
- safeguarding land for a potential EWPT corridor along the A414; and
- developing a network of pedestrian and cycle routes.

We will be undertaking more detailed work in due course.

- 4.95 However, the development strategy does anticipate the need for some road-building and modest increases in road capacity, where appropriate, in the towns especially to support the phasing, connectivity and integration of the larger planned growth locations. For example, in Hemel Hempstead there will be new connections across the north of the town, but the precise form and location of this is subject to further investigation.
- 4.96 Through the Duty to Cooperate process, we have been in discussions with Highways England (HE) over the strategic road network. HE has identified the need for capacity improvements to both J8 of the M1 and J20 of the M25, as well as a linked interest, respectively, in the A414 and A41 corridors. Both motorway junctions involve consideration of cumulative cross-boundary impacts with the adjoining authorities of St Albans City and District (under the wider HGC programme) and Three Rivers District.
- 4.97 We are carrying out additional evidence work in respect of growth impacts and intervention measures. In the case of J8 of the M1, much progress has been achieved under technical work supporting the delivery of the HGC programme. Therefore, the capacity of the junction is not necessarily an impediment to growth to the north and east of Hemel Hempstead.
- 4.98 Capacity issues for J20 of the M25 and related capacity issues with the A41 corridor, are recognised. Furthermore, we also acknowledge related congestion issues on the Watford Road (A4251) through Kings Langley and the proposal for a motor way service area (MSA) close to this junction (in the Three Rivers area). Accordingly, the Council has been cautious over expansion of the village and opportunities for directing growth to the south of the settlement.

5. Rejecting Reasonable Alternatives

- 5.1 This section of the topic paper explains what other spatial and growth strategies the Council considers to be reasonable alternative and why they have been rejected.
- 5.2 One of the tests of “soundness” for Local Plans identified by the National Planning Policy Framework (NPPF) (paragraph 35b)) is that it is “justified” in terms of having considered reasonable alternatives. Furthermore, in terms of looking at exceptional circumstances for releasing land from the Green Belt, the NPPF (paragraphs 137) expects Local Planning Authorities to demonstrate that they have fully examined all other reasonable options for meeting its identified need for development.
- 5.3 The Issues and Options consultation Local Plan initially rejected a number of growth and spatial options, some of which have elements that overlap with each other, including:
- Continuing with the current housing target (430 homes per annum);
 - Urban Capacity growth level (at 476 homes per annum);
 - A growth level above the upper Government figure (1,100+ homes per annum);
 - New settlement(s);
 - Rural growth;
 - Exporting substantial growth to another Council area;
 - Use of greenfield before brownfield land; and
 - Significant expansion of a large village(s).
- 5.4 The reasons for this were set out in the Issues and Options consultation Local Plan (see in particular Appendices B and C of that Plan). The Council believes that such conclusions continue to be valid and taking into account the Issues and Options consultation, further ongoing engagement with key stakeholders, and continuing progress with the evidence base. The reasons for rejecting these options are explored below in summary. However, our emerging local housing need figure (of 922 homes per annum) does fall close to the upper range of the higher growth level initially rejected.
- 5.5 In assessing other potential approaches to accommodating housing, employment and other development needs, this has helped the Council narrow down its approach. The preferred development strategy is set out in chapter 6 of this topic paper.
- (i) Lower growth levels
- 5.6 As explained earlier in this chapter, the Council has actively explored accommodating lower (than the standard methodology) growth levels. This could be argued as a justified starting point for Dacorum given the many high-level planning, landscape and environmental constraints it faces (see chapter 3). Equally, this would also run counter to the NPPF’s expectation (paragraph

59) that councils should be “..*significantly boosting the supply of homes...*” and that they make sufficient provision for their development needs, infrastructure and community facilities (paragraph 20).

5.7 The evidence base does point to this approach limiting the impact on the environment and the Green Belt land-take, and has had very strong support from local residents at the earlier consultation stage. It would be spatially less difficult to bring forward. Furthermore, lower levels of growth can be accommodated much more easily in our settlements and would place less strain on the capacity of local infrastructure.

5.8 However, the NPPF (paragraph 35a)) expects us to plan for the level of development that our evidence-base has identified if a Local Plan is to be “positively prepared” and ultimately found “sound”. Any option below the standard methodology would have to be robustly justified given this expectation. In respect of housing, the Council would have to likely continue to accept further rises in house prices, a reduction in the supply of affordable homes and a steadily worsening affordability gap, and more limited opportunities to secure necessary physical and community infrastructure. Regarding the latter, the Issues and Options consultation Local Plan pointed out that:

“Delivering infrastructure for scattered or small-scale growth can be very challenging, as it requires piecemeal upgrades to existing facilities, which may not always have the space or ability to expand.” (paragraph 9.0.8)

5.9 Reduced growth levels has economic implications for the local economy in terms of the ability of employers to recruit and retain key staff. A shortage of housing would only increase levels of in-commuting and hamper economic growth.

5.10 Furthermore, while acknowledging the challenges, the Council is committed to working with the wider benefits of growth as reflected in the Council’s Growth and Infrastructure Strategy. It would tackle local affordable housing issues, deliver regeneration of our towns, bring forward necessary infrastructure, and would put us in a better position to secure national funding in support of growth and its delivery.

(ii) Relying on urban capacity alone

5.11 The NPPF (chapter 11) requires that the Council gives priority to utilising brownfield and urban land and density options, particularly in relation to any decisions to release land from the Green Belt to meet future development needs. Urban capacity is discussed in more detail in the Housing and related evidence base documents.

5.12 We are committed, as far as we practically can, to ensuring that a justifiable balance can be secured between meeting housing and other development needs and protecting the character of our settlements, the Green Belt and surrounding countryside. We have fully explored through Plan policies,

development standards, and our technical work, ways of improving urban capacity. This has included optimising urban land and densities, particularly in established shopping centres, opportunity areas close to town centre and key transport hubs. We calculate that we can realistically achieve a total urban capacity of 10,954 homes over the Plan period (i.e. at an equivalent annual rate of just over 600 homes per annum). This is a considerable improvement on our position at the time of the Issues and Options consultation Local Plan (at 476 homes per annum).

- 5.13 Despite an improving position for urban capacity, based on both the existing and proposed revised standard method for calculating housing need (respectively 1,023 and 922 homes per annum), the urban capacity falls significantly short in both cases (Table 5.1). These deficits would be extremely difficult to bridge even assuming a more optimistic view on uplifting densities, taller buildings, increasing windfall sites, and greater flexibility over design standards, etc. (not least whether ever increasing assumptions for urban capacity would actually be practically achievable).

Table 5.1: Urban Housing Programme 2020 – 2038

Source	No. of homes (net)*
Commitments as at 1st April 2020	2,708
Urban Growth Areas	5,638
Grovehill Neighbourhood Plan	200
Windfall allowance	2,408
Total Housing Supply	10,954
Number of homes required to be built under existing standard methodology (1,023 x 18 years)	18,414
Deficit over housing need figure (18,414-10,754)	-7,460
Number of homes required to be built under draft standard methodology (922 x 18 years)	16,596
Deficit over housing need figure (16,596-10,754)	-5,642

- 5.14 The reasons set out above for rejecting the lower growth levels remain valid for this option.

(iii) Locating growth in the countryside

- 5.15 As explained in chapter 3 of the topic paper, Dacorum has an extensive area of countryside covered by both the Green Belt and Rural Area. It also contains a variety of small villages. The historic approach has always been to maintain the existing character of the countryside and these villages while allowing limited opportunities for new development.

- 5.16 In reality, the countryside supports a large number of small, relatively isolated villages. The Settlement Hierarchy Study also identifies that they generally lack local infrastructure. Furthermore, such settlements are more sensitive to

change. While modest levels of growth in these locations may bring some advantages in terms of the future viability of villages, the Council does not consider that this outweighs these concerns. As such, the rural parts of the Borough should not accommodate much development beyond meeting local needs.

- 5.17 Moreover, the countryside is not generally a location where larger-scale business development wants to locate from a commercial perspective, although it does support a number of smaller rural and tourism-related enterprises.
- 5.18 Arguments were made at the Issues and Options stage for the benefits of locating growth in the Rural Area. A key advantage of this would be minimising the release of Green Belt land for development. However, spatially this brings with it a number of problems. Growth would be poorly related to the existing, larger settlements and the higher tier services and facilities that they provide. In addition, accessibility is generally poor within the Rural Area alongside opportunities to promote sustainable forms of transport.
- 5.19 The Rural Area is not a simple and straightforward solution to safeguarding the Green Belt. Much of this area is covered by the sensitive landscape of the Chilterns Area of Outstanding Natural Beauty (see point (iv) below) and Boarscroft Vale. It contains a number of settlements that are recognised as being of high historic quality, including Aldbury and Little Gaddesden. The Rural Area is also constrained by a host of other biodiversity, environmental and heritage designations.
- 5.20 However, this does not rule out opportunities for the contribution from smaller scale development in the countryside in terms of keeping the villages vibrant and modestly supporting their services with a small increase in population. It should form a part of the development strategy. This includes village infills, rural exceptions for affordable housing on the edge of rural settlements, the reuse of rural buildings and the redevelopment of previously developed land where they arise in the countryside. We anticipate these coming forward over the lifetime of the consultation draft Local Plan. Indeed, the Government has widened the scope for this in taking a more flexible approach to new building and changes of use in the Green Belt and under permitted development rights. Furthermore, there may be a future role to be played by Neighbourhood Plans as they come forward to deliver moderate levels of growth in the rural parts of the borough.
- 5.21 In conclusion, we acknowledge that it is sensible to explore the scope for growth in the countryside, not just to help meet identified development needs but also to sustain rural communities. However, given the above points, the Council does not consider that directing a substantial proportion of the Borough's future development to the countryside, and in particular the Rural Area, is sustainable, desirable or necessarily deliverable. We do not consider that this would be a sustainable approach and would therefore not be in conformity with the policies contained within the NPPF.

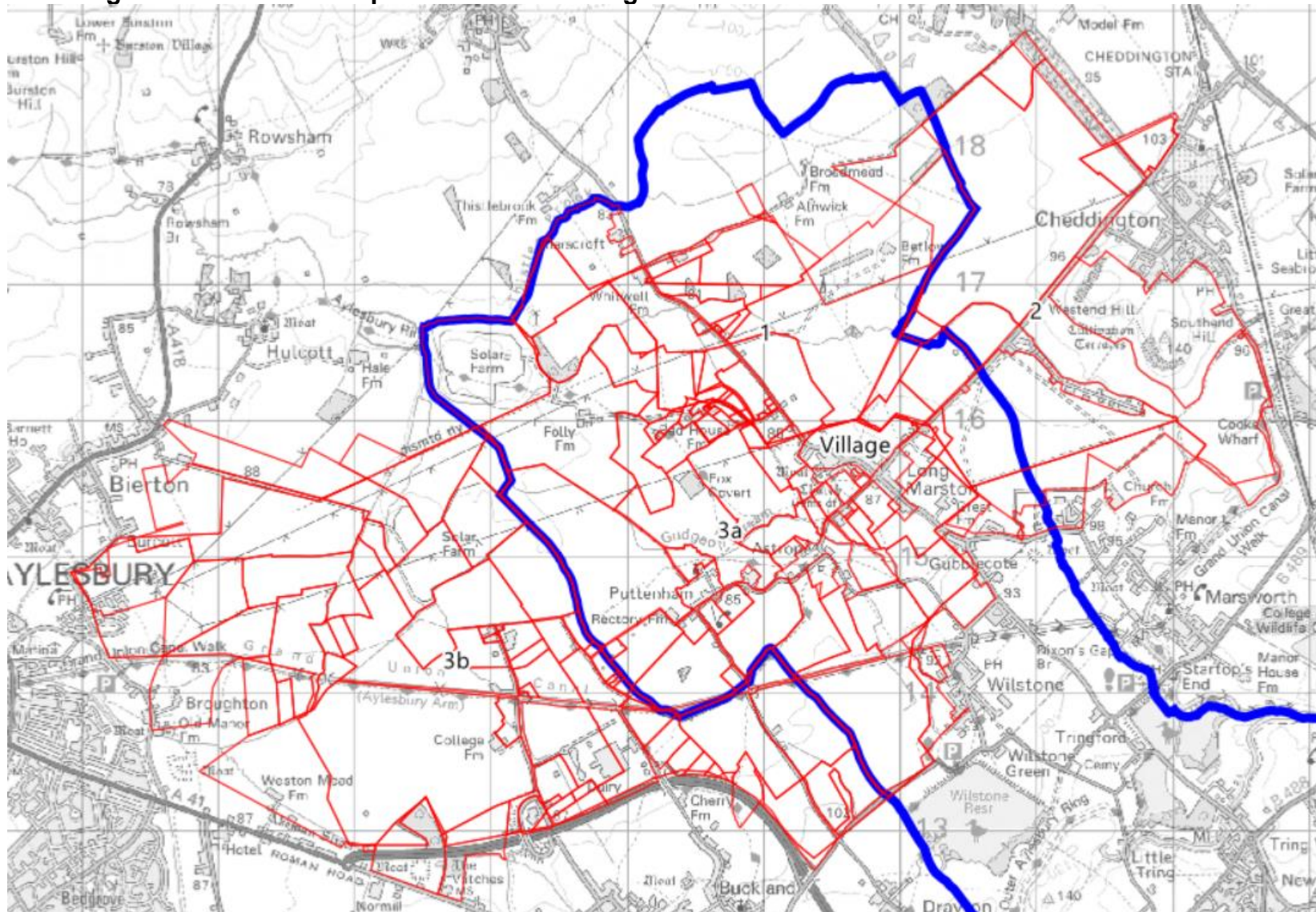
(iii) New Settlement

- 5.22 In theory, a new standalone town or village could offer a potential alternative spatial option for meeting a large amount of the growth in the Borough in a planned, well designed, accessible and sustainable way. It offers an opportunity to relieve the development pressure on other locations, particularly on the smaller settlements.
- 5.23 The Council considers that the only suitable area for a new settlement, if it is to avoid the Green Belt and areas of sensitive landscapes, would be the Rural Area to the north of Tring. Nevertheless, this would be very challenging to bring forward for a number of fundamental reasons.
- 5.24 Such a strategy would require a significant area of land to be identified, as normally the larger the settlement the more likely it is to be self-supporting and to be able to deliver genuinely sustainable outcomes. It would necessitate the ability of parties to assemble the land and deliver such a scale of development and all the associated infrastructure in a reasonable timescale. No area of land has been actively promoted to the Council before or after the Issues and Options stage of the Plan. Indeed, the Council has explored the extent of land ownership in this general location and identified that this part of the Borough is subject to multiple ownerships which would make land assembly very problematic (see Figure 4 below).

(vi) Significantly expanding large villages

- 5.25 Major growth in one or more of the large villages of Bovington, Kings Langley and Markyate would direct development to the less sustainable areas of Dacorum. The Settlement Hierarchy study has identified that these are not locations that have ready access to important higher order facilities and services. On the whole they do not offer as good road and public transport connections as the larger towns, albeit Kings Langley has a mainline railway station that lies in the Three Rivers District area.
- 5.26 In many instances, local infrastructure is constrained in terms of its ability to accommodate significant levels of expansion, particularly with regards to primary schooling. All of the villages are compact in nature and rural in character. Significant expansion of them will only serve to undermine these qualities, which are especially cherished by local residents.
- 5.27 Bovington suffers from congestion and parking problems on the High Street, and restricted scope to expand the primary school. Kings Langley is sensitive in terms of its limited separation from the southern edges of Hemel Hempstead and congestion problems to the south of the village given its proximity to J20 of the M25 and A41. Markyate also experiences congestion and parking problems on the High Street and is in part surrounded by the Chilterns AONB.

Figure 4 Land ownership to the north of Tring



- 5.28 In theory, the Council could explore increased growth levels in Bovington through a north westwards expansion onto previously developed land on the adjoining former Bovington Airfield. However, we do not support growth in this location because of a range of factors, particularly in terms of achieving a sustainable and deliverable form of development.
- 5.29 In reality, much of this land is actually open in character and would lead to a major encroachment of the village into open countryside. It would also result in diminishing the separation between the north western edge of Bovington and the hamlet of Whepley Hill. No willing landowner has come forward yet and therefore any expansion if chosen at this stage would raise issues of soundness of the Plan.
- 5.30 The scale of growth would have to be sufficient enough to deal with a number of major constraints to expansion including:
- Its relatively poor public transport and road connections;
 - Congestion issues along the High Street and around the village;
 - Overcoming height restriction associated with the air traffic control (NATS) navigation beacon at Bovington Airfield;
 - Improving its level of self-containment in terms of facilities and services;
 - Allowing primary school capacity to grow;
 - Protecting the role and function of the local centre;
 - Security issues given its relationship to HMP The Mount; and
 - Potentially relocating/curtailing/diminishing current activities that take place on the airfield.
- 5.31 Nonetheless, we do believe that the larger villages can play a role in the preferred development strategy and this is explored in chapter 6.
- 5.32 In reality, the Council does not believe that the Rural Area is particularly suitable to accommodate such a scale of growth for the reasons set out in paragraphs 5.18 - 5.21 above. Certainly, the Rural Area north of Tring has poorly developed transport links and any development would need to take into account a number of key constraints covering:
- The established pattern of small villages and hamlets in the area.
 - The Aylesbury Arm of the Grand Union Canal.
 - The impact on the Boarscroft Vale and its landscape of deserted villages.
 - A range of heritage and environmental assets, particularly the SSSI at Tring Reservoirs and Scheduled Ancient Monument (Deserted Village of Tiscott).
 - Possible merging with the eastern planned expansion of Aylesbury.
- 5.33 There would also be serious doubts as to the deliverability and developability over the Plan period of a new settlements given the significant scale and cost of infrastructure necessary to ensure it was accessible and well connected and brought forward in a genuinely sustainable manner. Experience across the country generally shows that such developments take many years to progress through the planning system to eventual completion.

(vii) Accommodating growth in the Chilterns Area of Outstanding Natural Beauty

- 5.34 A small number of landowners and developers have shown interest in promoting sites to accommodate some of the future growth either wholly or in part within the Chilterns Area of Outstanding Natural Beauty (AONB). This is not an option we can support, especially as there are preferable and deliverable options available in less sensitive locations outside of the AONB.
- 5.35 The Council affords great weight to the conservation of this nationally important landscape designation. This is consistent with paragraph 172 of the NPPF, which recognises the AONB as having “the highest status of protection”. The NPPF (paragraph 170) recognises that planning policies “should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes”.
- 5.36 For this reason, the Council’s approach has been to firstly look to see whether growth can be directed towards land not designated as AONB. Only if this process concluded that there would unlikely be sufficient opportunities to meet our development needs in less sensitive locations would sites in the AONB be exceptionally considered. However, the evidence to date concludes that in assessing reasonable alternative spatial options, there are options available capable of meeting future needs outside of the AONB. For this reason, we have not pursued meeting our development needs in the AONB.
- 5.37 The Chilterns Conservation Board, who are tasked with managing the Chilterns AONB, has acknowledged our efforts to avoid growth scenarios in this sensitive area. However, they remain concerned over the impact of growth on the setting of the AONB. We will be working closely with them and with the respective landowners and developers of preferred growth areas, to identify and bring forward appropriate mitigations and interventions.
- 5.38 The rejection of this option does not stop some modest growth from coming forward in the future on land designated as AONB. The NPPF (paragraph 172) does allow for some growth in this area, albeit proposals for major development should only be permitted in exceptional circumstances. Any strategy that the Local Plan carries forward will need to ensure consistency with this part of national policy.

(vii) Exporting growth to another Council area

- 5.39 As referred to above and bearing in mind Dacorum is subject to a number of key Green Belt, environmental and landscape constraints, the Council is committed to meeting as much of its development needs as it can within its own boundaries in accordance with national guidance. However, we have felt it prudent to also explore whether this could be met by adjoining authorities across the broader housing market area (and beyond) as part of Duty to Cooperate discussions. Equally, we have had reciprocal discussions with these Councils.

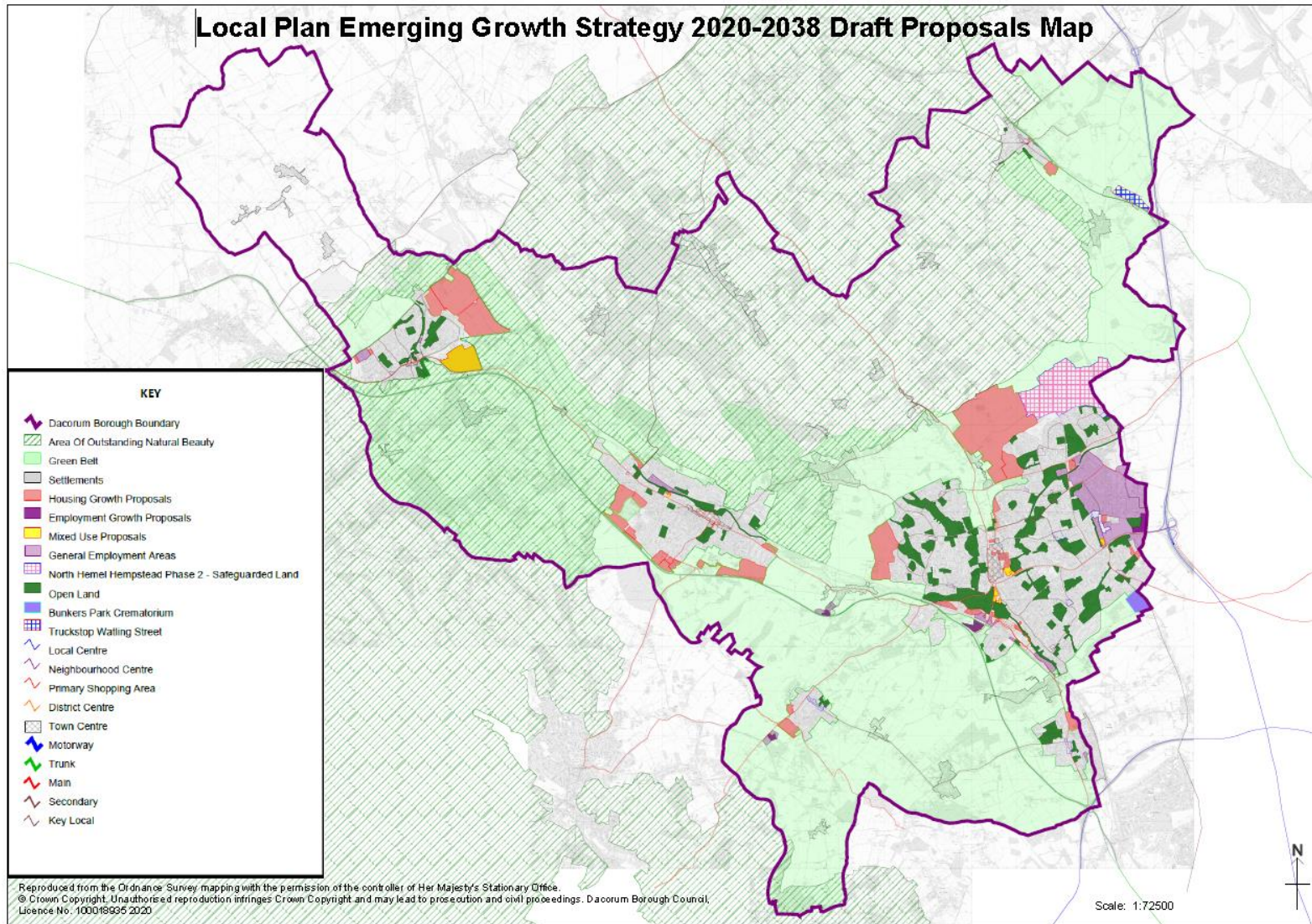
- 5.40 In reality, our on-going engagement with neighbouring and nearby local authorities reveal that they too are constrained in their ability to accommodate their own and potentially others growth, especially as a result of having to tackle higher housing needs signalled since the introduction of the national standard method. Furthermore, it is unlikely that we would have been able to secure sufficient support to avoid the need for at least some additional growth in the borough.
- 5.41 We have argued that some of the eastern expansion of Hemel Hempstead in St Albans City and District should form part of our own housing needs given its physical proximity and functional links to the town. However, St Albans is also having to accommodate higher housing needs in a Green Belt-constrained authority. This has not prevented the possibility of some of our employment floorspace needs being met there which has been agreed in principle with them.
- 5.42 These matters are being progressed with these respective Councils, and any agreement reached on meeting cross-boundary growth needs will be reflected through agreed Statements of Common Ground at the next stage of the draft Local Plan.

6. What is our preferred strategy?

a) General

- 6.1 Ultimately, the spatial distribution of development in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth is a function of a number of often inter-linked factors. These factors are set out in chapters 3 - 5 and have led the Council to a preferred development strategy. We believe our approach results in a balanced and proportionate distribution, achieves sustainable development and addresses our local strategic priorities. It takes into account a range of alternatives at both the strategic level and site-specific level (see chapter 5 and the Site Selection topic paper).
- 6.2 The preferred strategy is set out in summary in Figure 5 below. This can then be tested through the consultation draft Local Plan process and beyond, and be further refined before we make final decisions on an agreed approach to accommodating growth.
- 6.3 Our preferred approach to the overall scale of growth and its broad spatial distribution is logical and justified. It takes into account:
- meeting our development needs;
 - the capacity of local infrastructure;
 - delivery of the necessary scale of infrastructure;
 - the environmental and planning constraints of the Borough, including extensive NPPF paragraph 14 'Footnote 9' constraints; and
 - the broad sustainability of locations for development in terms of the nature and scale of services and facilities.
- 6.4 Our Growth and Infrastructure Strategy (paragraphs 3.3-3.7 above) highlights the importance of delivering housing and fostering economic growth, but also the critical importance of both place making and local infrastructure delivery to ensure that growth is genuinely sustainable.
- 6.5 We have followed sound and sustainable planning principles in narrowing down our strategy. It also fulfils a number of the locational principles established in the earlier Issues and Options Plan. In particular, it will:
- Deliver a strong network of sustainable settlements across the district.
 - Direct most new homes to the core areas of the borough as the most sustainable locations for new development.
 - Direct development to locations excluded from the Green Belt where housing need is the greatest/most need is met where it arises.
 - Seek to support sustainable patterns of travel.
 - Ensure most residents live reasonably close to a centre with a reasonable level of services.

Figure 5 Emerging Growth Strategy



- Provides for a choice of housing/market locations, allows for a range of development scales, and ensures a more even rate of housing supply can be sustained.
- Takes into account local infrastructure capacity, particularly primary and secondary schooling.
- Optimises opportunities for urban capacity.
- Where appropriate, concentrates development to achieve economies of scale/ critical mass to deliver an appropriate scale of infrastructure.
- Avoids harm to the CAONB and its setting.
- Avoids areas of high flood risk.

6.6 This mixed development strategy performs well as an approach as it takes into account satisfying a mix of uses generated by the area, achieving sustainable development and ensuring a focus on delivery.

6.7 The preferred strategy is based on meeting the Borough's development needs. The Council has concluded that, on balance, this is the most appropriate approach in accordance with national requirements, while recognising that it raises a number of significant challenges for the Borough. Not meeting its housing and other needs could result in:

- the Plan being found unsound and the loss control over unwanted, speculative schemes and its ability to protect areas from development;
- losing opportunities to properly plan for and coordinate essential infrastructure, community facilities, and affordable homes; and
- increasing in-commuting, worsening housing affordability, and economic growth hampered by a shortage of housing.

6.8 Chapter 4 explains the importance of Green Belt constraints in developing the preferred strategy. The level of growth is such that we have had to rely on the Green Belt to meet development needs, particularly if housing needs are to be met in full. This has resulted in the strategy directing growth to both lesser performing and essential Green Belt around the main settlements. However, these locations still support a pattern of planned and sustainable growth that offer opportunities for mitigation and compensatory improvements.

6.9 As encouraged by national planning, the Council has actively sought opportunities to promote urban capacity as a key component of its development strategy. It constitutes nearly two thirds of the housing programme to the consultation draft Local Plan. While this will lessen the impact on the Green Belt, some release is still required around the towns and large villages if we are to meet our development needs in full.

6.10 Only two small areas in Berkhamsted and Markyate involve any flood risk, but there is scope to limit this through the careful location and design of development.

6.11 The evidence base and ongoing engagement with key stakeholders to date have highlighted that there are no fundamental "showstoppers" in terms of infrastructure or other constraints that cannot be resolved in meeting this scale of growth, albeit

our approach to education and transport needs further refining with the County Council. This level of growth is able to support the delivery of a range of scales of local and town-wide infrastructure to offset much of its impacts.

- 6.12 The preferred strategy achieves a broad balance to and proportionate distribution of growth across the Borough focussed on the key settlements/most sustainable locations/opportunities for infrastructure and sustainable transport. This is summarised in Table 6.1 below.

Table 6.1: Proposed distribution of development by settlement

Settlement	No. of Homes	% of total LHNA
Hemel Hempstead	10,688	63.2
Berkhamsted	2,236	13.2
Tring	2,731	16.2
Bovingdon	241	1.4
Kings Langley	274	1.6
Markyate	215	1.3
Rest of the Borough	514	3.1
Total	16,899	100

b) Hemel Hempstead

- 6.13 As the most sustainable location in Dacorum, Hemel Hempstead should continue to be the focus for significant growth and investment. The town has the ability to deliver the majority of the Borough’s housing, employment and retail needs. It is the largest settlement in the Borough with the fullest range of services and facilities, and is least affected by major planning and environmental constraints. The town is of a sufficient scale to offer greater opportunities to make effective use of urban land, and to deliver a package of sustainable transport measures and key infrastructure.
- 6.14 Growth will be delivered through a number of existing and new urban allocations. Land will be optimised and densities significantly increased in opportunity areas and through targeted regeneration of key sites/key transport hubs close to the town centre and in Two Waters and Apsley. The latter will see the redevelopment of several underused employment sites, including the Hemel Hempstead railway station and other key locations across the area.
- 6.15 Urban growth will be complemented by the release of Green Belt land to the north and east (in St Albans and City and District area) of the town. It will be a major driver for significant change in Hemel Hempstead. This growth will provide a further catalyst for transformational change to the former New Town, build on its existing economic and locational strengths, and lead to renewal of its aging fabric. It will take forward the Council’s ambitions to transform the settlement into a 21st Century Garden Town in the medium to long-term.
- 6.16 Around 5,000 new homes are proposed to be delivered through this new urban extension to the north of Hemel Hempstead, with the majority of the land

safeguarded for future development after 2038. This safeguarded land is justified given the scale and complexity of the growth, long lead-in times, and the timing of infrastructure. It will ensure the long-term and comprehensive planning of this urban extension and its contribution to town-wide transformational changes and renewal. Mechanisms are in place to ensure the governance, programming and comprehensive delivery of the development in this location.

- 6.17 The urban extensions to the north and east of the town will deliver employment growth and investment through the expansion of the Maylands Business Park as part of the Hertfordshire Enterprise Zone (Innovation Quarter). However, most of this will be achieved across the border in St Albans and City and District area. Some additional employment needs can also be met to the south of the town near the A41 junction. Both locations would benefit from the proximity to the strategic road network. New floorspace will help to provide for a range and choice of sites for business, as well as offsetting ongoing employment land losses in the town.
- 6.18 While the town does have the best developed highway network and level of public transport provision, it does suffer from high levels of peak-time congestion, particularly the road network serving movements to and from the Maylands Business Park, the main employment location in Hemel Hempstead. Therefore, large scale transport interventions will be necessary to support higher levels of growth, especially the delivery of a suite of sustainable transport measures and a new northern link road/movement corridor associated with growth to the north of the town. This would also include the delivery of a number of linked sustainable transport corridors across the town, improvements to the network of pedestrian and cycle routes and an upgraded mainline railway station.

c) The market towns

- 6.19 Growth should also be directed to Berkhamsted and Tring as sizeable towns and reasonably sustainable locations outside of Hemel Hempstead, with both benefitting from mainline stations and close connections to the A41. Until recently, there has been comparatively limited planned growth in these settlements. The preferred strategy now proposes major expansion of both towns.
- 6.20 However, while levels of growth locally will be significant as compared against existing housing stock, it will be more restricted than in the case of Hemel Hempstead, given their greater environmental and infrastructure capacity constraints. For example, the Chilterns AONB abuts and/or comes close to their urban boundaries, and its setting forms a very important part of the character of these towns. Furthermore, the direct and indirect impact of growth on the Special Areas of Conservation which sits nearby to both towns will be another key constraint.
- 6.21 The approach to Berkhamsted and Tring has been to balance their roles as market towns with their locations as sustainable centres in the Borough. Growth also needs to recognise the proximity of the Chilterns AONB, and the need to deliver a viable secondary school solution to these settlements. Furthermore, such growth will help support the continuing viability and vitality of their town centres and other local services and facilities in the town.

- 6.22 The scale of growth provided will be brought forward as larger linked releases to help deliver these infrastructure gains, particularly new primary and secondary schools. Urban opportunities are more limited within their settlement boundaries, so most of the new development will come forward as planned, edge of settlement extensions.
- 6.23 Growth in Berkhamsted will be strongly influenced by its valley-town character. Most development will be in valley side and ridgeline locations, continuing with the historical pattern of change in the town. Growth will principally fall to the south east and south west of the town across a range of varying sized locations. Generally minimising its proximity to the Chilterns AONB and broadly maximising, as far as it can, its location to the town centre and railway station. However, this will still require associated improvements to bus, pedestrian and cycle links to these key locations.
- 6.24 The strategy seeks to identify growth areas that limit the impact on the Chilterns AONB and on the better performing Green Belt areas, with future outward expansion being strongly contained by the A41. It also avoids growth to the east of Berkhamsted to prevent the outward expansion of the town merging with Bourne End, undermining the green entry into the settlement, and potentially impacting on the wider setting of the Chilterns AONB.
- 6.25 Growth will be of a sufficient scale to enable new primary and secondary schools to be brought forward. Large-scale development to the south of the town will be of an appropriate size to deliver a new primary school, and a range of new homes, a local centre hub, infrastructure and green spaces.
- 6.26 The strategy directs the bulk of growth in Tring to a small number of large urban extensions to the east and south east of the town. This takes advantage of their proximity to both the entry to the town/town centre to the west and better accessibility to the railway station to the east. Growth will be contained by the Bulbourne Road to the north, London Road/Cow Lane to the south, and the Grand Union Canal to the east.
- 6.27 These growth areas will also be of sufficient size to ensure the delivery of new schools, key infrastructure, new green spaces (particularly the creation of a major green corridor alongside the Grand Union Canal) and a local centre hub. There will even be an opportunity for a sizeable expansion of the employment base of the town and to potentially allow for new retail floorspace, if a foodstore site in the town centre cannot be realised.

d) The large villages

- 6.28 The Council believes it is important that opportunities for growth are spread across the borough, including to the larger villages of Bovingdon, Kings Langley and Markyate. This will assist in maintaining and enhancing the range of existing services and facilities there, as well as potentially delivering modest levels of new infrastructure.

- 6.29 However, the strategy recognises that their smaller and compact sizes and rural character do constrain opportunities for growth. Accordingly, it directs only relatively modest levels of growth there. They are not locations that have ready access to higher tier facilities and services. Nor do they have as well developed road and public transport connections as the larger towns, except for Kings Langley which does possess a mainline railway station.
- 6.30 As explained in chapter 5, these villages are constrained by local infrastructure capacity. Growth is capped in Bovingdon to take into account congestion and parking problems on the High Street, and in particular, restricted scope to expand the primary school. The latter has involved discussions with the County Council to consider options, but none at present have proved viable or practical to bring forward. Therefore, growth is chiefly restricted to a modest southward, greenfield extension of the village. Outward encroachment there will be readily contained by Chesham Road and Green Lane.
- 6.31 Kings Langley is sensitive in terms of its limited separation from the southern edges of Hemel Hempstead and congestion problems to the south of the village given its proximity to J20 of the M25 and A41. It also has a strong cross-boundary relationship with Three Rivers District, and recent development that has taken place there (and is also planned for). However, unlike Bovingdon and Markyate, it does have its own secondary school, and access to a mainline railway station and reasonable levels of local employment.
- 6.32 The local and strategic highway issues has restricted opportunities for growth to the south of the village. There are also a number of archaeological and heritage constraints in this area. As a result, the strategy directs development to the north of Kings Langley. This location takes advantage (in part) of existing previously developed land there (some of which already benefits from planning permission for housing), and its proximity to the village centre to the south and access to employment and retailing to the north in Apsley/Nash Mills. There is also an opportunity to create a green corridor adjacent to its eastern boundary with the Grand Union Canal. This boundary and the Hempstead Road can serve to contain any development, but this will require a strengthening of the northern boundary with the retained Green Belt.
- 6.33 Markyate is both smaller than and is a relatively unsustainable location compared to Bovingdon and Kings Langley, especially in relation to public transport and diversity of local facilities. It similarly suffers from congestion and parking problems within the village centre. Much of its original employment base has been recently lost to housing and the village centre has experienced relative decline over time. Furthermore, the village is also almost comprehensively surrounded by the CAONB on its western side. On this basis, the strategy identifies a slightly reduced scale of development there relative to the other two large villages.
- 6.34 Growth is located towards the south of Markyate. This reflects historic growth of the village along the Ver Valley. The village does extend eastwards across the A5183, but any growth there would not be very sustainable, it would be detached from the main body of the settlement and access would be poor to services there. The proposed growth location allows for good access onto London Road and the

village centre. A small part of this area does fall within the River Ver flood zone, but it is large enough to allow development to come forward through the careful design and location of uses.

e) The Countryside

- 6.35 As established in chapter 5, the countryside is not an appropriate location to meet housing and other development needs, except for small-scale opportunities within and around the small villages and where this supports their vitality and/or meets local needs. The Council is not convinced that it should have a significant role in the strategy, particularly the Rural Area north of Tring. While development in the Rural Area could relieve pressure on the Green Belt, the area as a whole performs poorly in terms of accessibility, sustainability and availability to services and facilities. Furthermore, there are practical delivery issues in delivering large-scale growth options there.
- 6.36 Directing development away from the countryside will protect the character and value of important landscapes, heritage and biodiversity. The strategy also takes into account the sensitivities of the Chilterns AONB by the careful location of growth areas. None are located in the AONB and there are good prospects to mitigate the impacts on its setting where growth is adjacent to it, should this arise (see Site Selection topic paper).
- 6.37 However, the preferred strategy does anticipate some specific and very limited role for planned development in the countryside. The strategy envisages limited expansion of existing employment areas in Bourne End and at the former Bovingdon Brickworks to meet some employment needs and where supported by local environmental gains (see Employment topic paper for further details).
- 6.38 Highways England recognise a regionally identified shortfall in lorry parking. They are in principle supportive of expansion of the current truck stop on the A5183 close to J9 in order to address some of this parking stress.

7. Conclusions

- 7.1 This Topic paper explains how the Council has developed its spatial strategy. The Council has sought to deliver a sustainable approach to development despite the challenges of the levels of growth it is facing and the extensive constraints faced by the Borough. In principle the plan seeks to meet overall housing need in the right places through a logical and evidence based spatial strategy that promotes sustainable development patterns.
- 7.2 We have tested a wide range of spatial options and explored their implications across a range of factors. This has been supported by an extensive evidence base. We have carried out a wide-ranging consultation with the public at the Issues and Options stage. This set out detailed options for the community to consider. The Council has also undertaken considerable engagement and shared its evidence base with key stakeholders throughout the process of developing its position on the level and distribution of growth. This process has been reinforced and informed by its collaborative working with key bodies on strategic matters under the Duty to Cooperate.
- 7.3 In reality options are limited. The Council has concluded that it should face up to these challenges and that accommodating lower growth levels would not be the best option for the Borough. While the Council recognises the difficulties of meeting its development needs and securing the necessary infrastructure, it considers the benefits of this scale of growth, on balance, outweigh these problems.
- 7.4 The Council has explored optimising “brownfield” opportunities to accommodate growth within the settlements, but even taking into account a greater emphasis on uplifting densities, increasing windfall sites, and flexibility over design standards, what can reasonably be brought forward cannot meet need in full. Similarly, the Rural Area beyond the Green Belt was not seen as being appropriate to accommodate growth in a sustainable manner. Other options, such as a new settlement, were not considered feasible or deliverable over the lifetime of the Plan.
- 7.5 Given the above points, existing Green Belt land is required for development. There will have to be extensive release of Green Belt land across a number of towns and larger villages in order to accommodate identified need for housing. The scale of growth has inevitably meant that some development in the form of urban extensions will have to extend into better performing areas of Green Belt.
- 7.6 The Council considers it has struck a balance in terms of meeting its housing, economic and other development needs in sustainable locations while taking into account the Borough’s many environmental constraints. Development will generally be focussed away from the more sensitive parts of the Borough and smaller network of rural villages.
- 7.7 The spatial strategy will concentrate growth within the towns and villages excluded from the Green Belt. It will seek to significantly increase the level of housing over the lifetime of the Plan, deliver increased provision of affordable homes, will be of a critical mass to deliver key infrastructure, and will help continue the regeneration of

the larger settlements, particularly Hemel Hempstead and its Garden Town aspirations.

APPENDICES

Appendix 1 Summary of responses to the Issues and Options consultation Local Plan

Question 8

A1.1 There was broad consensus for focussing development in the towns and larger villages (Question 8) as sustainable locations, particularly where this was infrastructure-led and subject to its impact on character in each case. However, there was some limited support for growth in the rural areas and smaller settlements.

Question 9

A1.2 There was significant support from key stakeholders, Town and Parish Councils, individuals, resident action groups and other organisations for protecting the Green Belt from development in response to Question 9. They raised a number of concerns over the suitability and what they regarded as harmful impacts of releasing land from the Green Belt. Some respondents took a more pragmatic view stating that if Green Belt development had to come forward then this should be used as a way to ensure greater levels (in the order of 50%) of affordable housing. However, many developers and land owners agreed that land that performs poorly in relation to the five NPPF principles should be removed from the Green Belt.

A1.3 Central Beds recognised that higher than anticipated growth levels would mean that further Green Belt release would be needed across the Borough. St Albans were concerned that the Council had not done enough to encourage urban regeneration and development beyond the Green Belt. Hertfordshire County Council took the view that Green Belt releases would need to take into account how accessible and sustainable such locations were, and they were supportive of using Green Belt for multiple uses.

Question 11

A1.4 A variety of responses were made to the Councils approach to selecting sites (Question 11). These overlapped earlier concerns about growth in general and its impact (individually and cumulatively) on the settlements, the Green Belt/Rural Area, and the need for (or lack of) infrastructure. There was considerable support for making effective use of urban/previously developed land, including smaller and windfall sites. The Chilterns Conservation Board (CCB) stressed that the AONB should be a very important factor in assessing where development should be located.

A1.5 A number of landowners have made representations in support of the release of their land from the Green Belt for a variety of reasons, including their overall suitability and contribution to meeting growth. Where there was support for this from individuals it was on the basis of schemes being properly planned for, and that they were away from sensitive areas and in sustainable/accessible locations.

Question 15

A1.6 Question 15 on defining the Housing Market Area (HMA) did not generate large volumes of comments. Most responses were concerned with what precise area this should cover and the implications of this in terms of where and how need (and unmet need) is met. Some supported the HMA extending into Buckinghamshire and Bedfordshire. A few felt that the HMA would allow other South West Herts councils to meet some of their housing need in Dacorum and highlighted the adverse effects of this.

Question 16

A1.7 Question 16 was concerned with which of three growth level would be the most appropriate. Residents, Town and Parish Councils and local action groups were generally supportive of the lower growth level (602 homes per annum). However, some were still concerned that this was not reflective of local circumstances.

A1.8 Many developers/ planning consultants, Markyate Parish Council and Chilterns and South Bucks District Council felt that a growth level of 756 homes per annum is an appropriate starting point based on evidence needs (in the (then) SHMA). However, the former group also argued that the plan and housing land supply should have enough flexibility to meet a higher growth level if circumstances justified. Not all agreed that this was an appropriate figure citing that Dacorum would not be able to accommodate the growth proposed.

A1.9 Alternatively, there was support for the highest of the growth options (1,000-1,100 homes per annum) put forward. Respondents felt this was the most appropriate scenario as it complied with the Government's standardised methodology approach and that it would more accurately meet housing needs of the Borough. However, some respondents did caveat their support. Some argued that there needed to be consideration of the amount of development each settlement could take based on these housing numbers. While others stressed that there needed to be cooperation with other authorities in determining how housing number are met.

A1.10 Question 16 did allow flexibility for respondents to explore other growth levels. Many of those who commented sought lower figures as this was felt to lessen the impact on the Green Belt, settlement character, local infrastructure, etc. Some thought the Council had underestimated the contribution from urban capacity. Others considered that the housing figures should be based on local needs rather than Government set values and should not have to take further growth levels from London. A number of developers believed that the higher value should be sought, as this will be required by the Government standard methodology when the plan was adopted.

A1.11 A number of neighbouring local authorities also responded to this element of Question 16. The responses mainly focussed on the issue of meeting the need within the HMA and how any unmet need was to be tackled.

Question 19

A1.12 Question 19 focussed on the timing of site delivery. There was strong support for prioritising previously developed land over greenfield sites (e.g. Northchurch PC, Chiltern Conference board, the Chiltern Society). Infrastructure was also seen as being closely linked to delivery. Respondents were supportive of the earlier delivery of infrastructure (often in advance of the housing). Developers tended to favour the early release of large sites as they were seen as securing infrastructure and the delivery of housing.

Questions 33-35

A1.13 Questions 33-35 asked further questions regarding growth levels. Question 33 enquired whether the three growth levels proposed were the most reasonable to consider. Many of the responses mirrored those to Question 16. A number of organisations were seeking lower housing figures than 602 homes per annum (Northchurch PC, Berkhamsted TC). Many residents felt that the Council had not actively explored alternatives to growth. Others urged caution (e.g. Tring TC) because of the need to take into account the constraints of the Borough, the capacity of settlements and heritage impacts (Historic England).

A1.14 Not unsurprisingly, many developers argued that the Council will need to reflect the Governments standard methodology approach, or risk being found unsound.

A1.15 Question 34 asked whether respondents agreed with rejecting the following growth levels:

- Continuing the current housing target (430 homes a year);
- 'Urban Capacity' option (476 homes a year); and
- Significantly above the upper Government figure (1,100+ homes a year).

A1.16 Berkhamsted TC and Northchurch PC took the view that the current housing target of 430 homes per year should be maintained given that the infrastructure across Dacorum is at capacity. A small number of organisations supported the urban capacity option (The Chilterns Conservation Board, local residents groups). Central Bedfordshire Council suggested that the Council should plan to meet the upper Government growth figure (option 3) until a final housing figure is identified.

A1.17 Question 35 enquired as to whether the Council had considered all reasonable alternative levels of growth. Again there was a repetition of responses to those under previous linked questions. The parishes, residential and civic groups sought lower growth levels. Developers sought growth at higher levels and were satisfied that that lower levels of growth had been properly discounted through the process. Central Bedfordshire Council was also supportive of higher growth levels. Historic England did not have a preference on growth options pending further analysis on heritage impacts. The Chiltern Conservation Board suggested that the capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number of homes.

Question 36

- A1.18 Question 36 sought views on the proposed location principles set out in the Issues and Options Plan. A variety of organisations expressed their broad conditional support for these principles. Hertfordshire County Council suggested that sites should be chosen based on their sustainability performance and their ability to provide infrastructure provisions to support development. Other respondents argued that the locational principles need to take into account the specific constraints of each settlement or be reviewed on a site-by-site basis.
- A1.19 The Chiltern Conservation Board and Chiltern Society objected to the principles as they omitted consideration of the CAONB and/or its setting. Numerous respondents disagreed with the principles for high density building as they felt there was a greater need for family homes and outdoor space in developments. In addition, some rejected the principle requiring securing a 5 year housing supply. On the whole, developers believed that the locational principles restricted the deliverability of development, as it did not consider the availability of brownfield sites and the importance of urban regeneration.

Question 37

- A1.20 Question 37 asked whether respondents agreed with rejecting the following growth distributions:
- New settlement (town or village);
 - Rural growth;
 - Export growth to another Council area;
 - Use greenfield land before brownfield land; and
 - Significant expansion of a large village(s)
- A1.21 There was some broad support for rejecting these options and Historic England continued to express no specific view pending further analysis on heritage impacts. However, the views of nearby local authorities was much more varied. In particular, many felt the Council should pursue a new settlement further. Hertsmere was more supportive of exploring the benefits of this and Aylesbury Vale also noted why this was being rejected as an option. Welwyn and Hatfield considered that a smaller village of 1000 new dwellings could be a sustainable alternative. Hertfordshire County Council supported rejecting the majority of the growth options but felt that new settlements can actually provide the opportunity to plan for sustainable modes from the outset and, if large enough, would have critical mass for services.
- A1.22 Of the local authorities who responded, St Albans City and District (SADC) considered that these were reasonable alternatives and should not have been rejected. They did not accept our case for rejecting new settlements, large village expansions and rural growth. SADC urged the Council to explore options that lie beyond the Green Belt (and AONB), particularly the area north west of Tring. The area could provide for 15-20,000 homes based on their high level estimate. SADC also felt the Council should consider expanding Markyate.

Question 38

A1.23 Question 38 then sought comments on whether the Council had considered all reasonable alternatives for distributing growth. This only generated very few new options. Some respondents referred to opportunities at Bovingdon Airfield and another suggested a hybrid of the options could be pursued. Most comments were focussed on arguments for and against how growth could be distributed across the three towns and what form this could take.

Questions 39-45

A1.24 Questions 39-45 were concerned about respondent's preferences for seven spatial growth options put forward in the Issues and Options Plan. These options were based on a combination of the three growth levels (602 (option 1), 756 (option 2) and 1,000 – 1,000 (option 3) homes per annum) and whether they were distributed across the three towns (option A), focussed more on Hemel Hempstead (option B), or spread more evenly across the borough (option C). The differences between individual scenarios reduced with the higher growth levels that needed to be accommodated such that there was only one spatial distribution under the option 3 growth level.

A1.25 Given the number of options and the amount and varied nature of the comments they generated, it was difficult for the Council to understand whether there was any clear preference for a spatial distribution. Respondents in theory could object and support to all options.

A1.26 Most of the responses were linked to earlier comments over individual's support for particular levels of growth and how this was to be accommodated. Again residents tended to favour distributions associated with lower growth levels (many could not even support this) that were seen as having less impacts on the Green Belt and the character and capacity of settlements, and the development industry were more likely to support the opposite approach. Organisations based outside of Hemel Hempstead tended to favour concentrating development there, especially where it could support urban regeneration along with affordable housing in areas where employment was available.

A1.27 Those who supported lower growth levels repeated arguments for minimising Green Belt releases, avoiding the merger of settlements, focusing on urban capacity, infrastructure shortfalls, meeting needs outside the Borough, etc. The CCB preferred the lower of the options that focussed growth at Hemel Hempstead (i.e. Option 1B). It was seen as having the least adverse impact on the Chilterns AONB and its setting. Chiltern and South Bucks tended to raise greater concerns over higher growth levels where focussed outside of Hemel Hempstead.

A1.28 Many who preferred higher growth felt that Option 2A better met assessed need and they favoured concentrating this at the three towns. These settlements were seen as being able to accommodate growth and deliver infrastructure. Some developers argued that option 3 would be more appropriate due to changes in the Government standard methodology.

A1.29 A small number of respondents argued that there should be opportunities for the more rural settlements to provide some housing growth to ensure they remain vibrant/ viable. Hertfordshire County Council expressed no strong preference (from a transport perspective) but supported proposals to focus on the three main towns, and some development in the smaller settlements to help support rural bus services. Interestingly, Luton Airport was against proposals for development in Markyate as they have a duty to limit the number of people living in areas affected by aircraft noise.

Questions 46

A1.30 Question 46 sought feedback on the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanied the Issues and Options Local Plan. The former generated a large number of comments from local residents and a number of organisations, often in objection to them. These matters are explored further in the Site Selection topic paper.

Appendix 2 Summary of Green Belt review studies

A2.1 The draft Plan has been subject to a series of Green Belt reviews:

- Green Belt Review Purposes Assessment – Final Report (November 2013)
- Stage 2 Green Belt Review and Landscape Appraisal Report January 2016 (Published December 2016)
- Stage 3 Green Belt Review – Final Report (August 2020)

A2.2 The studies can be accessed using the following link to the Council's website:
<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

A2.3 Each review represented an increasingly finer grained focus on Green Belt boundaries and landscape constraints. Neither Stage 1 nor 2 of these studies made any recommendations for specific development opportunities. Alternatively, the Stage 3 process was much more site-led. All of the reviews have helped the Council's understanding of the constraints and opportunities for development, and its implications for the wider Green Belt and detailed boundaries. This work, in conjunction with other evidence base studies, has guided the Council's decisions over the most appropriate locations for planned growth in the Borough.

A2.4 The Stage 1 study was commissioned jointly by Dacorum, St Albans and Welwyn and Hatfield authorities and was prepared by Sinclair Knight Merz. The consultants undertook an assessment of the Green Belt in each authority to identify how it met the purposes of the Green Belt set out in national guidance. The study concluded that, on the whole, all strategic parcels in the Green Belt, at least in part, clearly performed a key role in terms of the Green Belt function nationally and locally. It was clear that most of the Green Belt performed important functions that relate to checking sprawl, preventing merging, safeguarding the countryside, preserving setting and maintaining the local settlement pattern.

A2.5 However, it did identify a small number of strategic sub-areas that were seen as contributing least to Green Belt purposes and should be subject to further assessment:

- D-S1 – Land enclosed by B488, A41 and west of Tring (GB03).
- D-S2 – Land enclosed by A41 and southeast Berkhamsted (GB11).
- D-S3 – Land south of Hemel Hempstead enclosed by the A41 and railway line, and in the vicinity of Rucklers Lane (GB14B).

A2.6 Furthermore, it identified two smaller sub areas that were similarly seen as contributing least to such purposes:

- D-SS1 – Land west of Hemel Hempstead (GB10)
- D-SS2 – Land at southeast edge of Bovington (GB13)

A2.7 In the case of Dacorum, the study did not make any suggestions for boundary adjustments that could be made that would not compromise the achievement of the overall purposes of the Green Belt.

A2.8 The Council commissioned a Stage 2 Green Belt review which was undertaken by Arup. This study also included a landscape appraisal. The review assessed in more detail those strategic and small-scale sub-areas of the Green Belt in the previous review that were considered as “contributing least” to national Green Belt purposes, alongside additional sub-areas at the edges of the towns and large villages. The work continued to note that all of the sub-areas examined were considered to meet one or more of the NPPF purposes, though the degree to which different parts of the Green Belt contributed to the individual purposes varied significantly.

A2.9 The study made clear that it did not aim to determine future amendments to the Green Belt boundaries in Dacorum. It identified a series of further refined Green Belt sub-areas around the key settlements which, on the basis of their strength against the NPPF Green Belt purposes, level of environmental and heritage constraint, and landscape sensitivity, should be considered further as part of the Council’s future site selection process.

A2.10 The further refined Green Belt sub-areas were divided into less constrained and more constrained groups as follows:

Degree of constraint	Settlement	No. of sub areas
Less constrained	Berkhamsted	6
	Bovingdon	3
	Hemel Hempstead	3
	Kings Langley	2
	Markyate	1
	Tring	2
More constrained	Berkhamsted	2
	Hemel Hempstead	3
	Kings Langley	1
	Tring	2

A2.11 The Stage 2 Review also suggested, as part of the Rural Area assessment, an addition of two sub-area to the Green Belt to the north of Markyate and recommended an amendment to correct an anomaly to the south of Berkhamsted to create a stronger defensible boundary with the A41.

A2.12 The Stage 3 review differed from the previous two stages in that it was more site-informed. Arup was also appointed by the Council to prepare the review. This summarised the results of a review of the Green Belt boundaries informed by the Council’s on-going work on preferred site allocations. The study had three main components:

- To assess preferred housing and employment sites, their boundaries and potential mitigation measures;
- To advise on new Green Belt boundaries around the six key settlement following consideration of these sites; and
- To assess the landscape and visual impact of the potential housing and employment sites.

A2.13 The study did not fundamentally alter the broad conclusions of the earlier Stage 2 review. The majority of sites reviewed were found to have strong existing Green Belt boundaries, which would be considered to meet the NPPF requirements of being clearly defined, readily recognisable and likely to be permanent. Six sites were considered to have relatively weak boundary edges and so they recommended strengthening if the opportunity arose.

A2.14 The review also considered the strength of the resulting Green Belt boundaries if a site was released from the Green Belt. In summary, it concluded that:

- Four sites would result in new Green Belt boundaries that would be considered readily recognisable and likely to be permanent.
- Thirty sites would result in weak new Green Belt boundaries, where boundary strengthening would be required.
- Sixteen sites were found to lead to anomalies, unless the area of land released from the Green Belt was enlarged.