

**DBC 2017 Local Plan DEF Draft Response to Issues and Options Consultation**  
**Colour coding in this document:**

**Default, including quotes from the Issues and Options Consultation: Black**

**Quotes from other documents: Blue**

**Suggested DEF responses: Green (*Italicised = for representation to MPs*)**

(DEF Participants: please say which Question Number their contribution is for, whether or not it is listed below.)

**(Page numbers as per Acrobat, not as in-document)**

**P21 Question 1 (of 46)**

Do you agree with the conclusions reached in the Sustainability Appraisal?  
Working Notes that accompanies this Issues and Options document?

TRL's Schedule Of Site Appraisals Working-Note, is arbitrarily casual. For instance re HH-h1b in its classification the Landscape Impact as "likely to have some positive and some negative effects, none of which are significant" and water as "No predicted effects". This contrasts with the recommendation of Schedule of Site Appraisals to "Exclude from further assessment and retain as Green Belt." which we support.

The assurance Re Site Reference: HH-h1b - North under "Climate Change" that this site would "require the provision of a range of facilities and services in two local centres (e.g. schools, shops, healthcare facilities) thereby reducing the need to travel for many day to day needs" is not matched by experiences when planning has reached a later stage, by which time the Council seems to have handed over responsibility for such matters to the developers and other agencies, and this would be particularly true for smaller and medium sized sites.

For instance after the creation of the (shop-less) Fields End estate, the pressure led a to a proposal (1990 Borough Plan Proposals) to build a new supermarket and car park on Northridge Park, arguably the finest and hitherto most sensitively managed park in the Borough.

More recently the medical centre at one stage floated for LA3 is not part of current plans.

From Sustainability Appraisal Working Notes:

For each site an assessment has been undertaken, with each 'Site versus SA objective' relationship being 'scored' using the significance criteria shown in Figure 2-1. The assessment scoring is supported by an assessment commentary to provide the rationale behind the score allocated.

✓✓	The option is likely to have a significant positive effect
✓	The option is likely to have a positive

	effect which is not significant
?	Uncertain – It is uncertain how or if the option impacts on the SA/SEA objective
-	Neutral – The option is unlikely to impact on the SA/SEA objective
x	The option is likely to have a negative effect which is not significant
xx	The option is likely to have a significant negative effect
+/-	The option is likely to have some positive and some negative effects, none of which are significant

### FOR EXAMPLE

Site Reference: HH-h1b - North		Site HH-h1b North Hemel Hempstead (Phases 1 and 2)	
1	Biodiversity	The site is greenfield and there would therefore be loss or damage of some habitats. The site also includes Varney's Wood wildlife site and is adjacent to Thrift Wood wildlife site and High Wood wildlife site, all of which contain ancient woodland, which could be affected by development. Development at this large site would provide the opportunity to include a Suitable Alternative Natural Greenspace (SANG) area which could deliver local biodiversity enhancements as well as providing the potential to reduce recreational pressure on the Chilterns Beechwoods SAC, particularly at Ashridge Estate.	+/-
2	Water	No predicted effects.	-
3	Flood risk	No predicted effects. This site is in a low risk flood zone and not in flood risk zone 2 or 3.	-
4	Climate change	This site is located some distance from the town centre which could result in increased car use and growth in the level of greenhouse gas emissions.	+/-
<p>The potential scale of development would require the provision of a range of facilities and services in two local centres (e.g. schools, shops, healthcare facilities) thereby reducing the need to travel for many day to day needs. This would help reduce the growth in greenhouse gas emissions that would inevitably result from any new development. In addition the development could provide a new bus loop which could be used by new and existing residents of the area and help to reduce car use. The development could also improve bus patronage for existing services and support their viability.</p> <p>The development would be large enough for district heating opportunities to be explored.</p>			
5	Air Quality	This site is located a distance from the town centre, so there could be an increased use of the car. However the provision of services and facilities with the new	?

		development will reduce the need to travel and there could be beneficial implications for air quality depending on the uptake of this mode and the provision of services in the local centre being adequate for the needs of the local community. In addition the development could provide a new bus loop which could be used by new and existing residents of the area and help to reduce car use. The development could also improve bus patronage for existing services and support their viability. The site has the potential to provide a new link road to connect the Leighton Buzzard Road with Redbourn Road. It is uncertain how this will affect local air quality, but if it relieves congestion it could result in improvements.	
6	Soils	This site would result in a loss of greenfield land, and development would result in soil sealing.	x
7	Resource efficiency	No predicted effects.	-
8	Historic environment	The site contains four Listed Buildings (Barn at Little Lovetts End Farm; Eastbrook Hay Farmhouse and Barn; Barn at Holtsmere End Farm; and Holtsmere Manor). The site adjoins the Piccotts End Conservation Area and an Area of Archaeological Significance ('Late medieval settlement of Piccott's End'). The effects of new development on these assets is uncertain.	?
9	Landscape / Townscape	The northern boundary of the western area of the site is adjacent to the Chilterns AONB and development could affect the setting of the AONB. The site is within the High Gade Valley and Gaddesdon Row character areas. Development of the site would extend Hemel Hempstead into this prominent area of countryside.	+/-

10	Health and wellbeing	The site is located at a distance from the town centre, which could discourage walking and cycling.	+/-
Development at this location could provide a new country park for the town which would provide opportunities for recreation contributing towards healthy lifestyles. In addition the provision of new healthcare facilities will help to improve everyone's access to healthcare.			
11	Sustainable locations	The site is located at a distance from the town centre; however there are two local centres planned as part of the development which will meet some day to day needs and help reduce the need to travel. In addition the development could provide a new bus loop which could be used by new and existing residents and provide opportunities to avoid car use. The development could also improve bus patronage for existing services and support their viability.	✓
12	Community cohesion	The site is located at a distance from the town centre; however a local centre is planned which will provide new infrastructure (e.g. primary and secondary schools and	✓

		healthcare facilities) which will meet some day to day needs as well as taking pressure off existing local services and infrastructure By providing additional housing and contributions towards wider infrastructure improvements for the town, development at this site could help to maintain community vibrancy and vitality.	
13	Housing	Development of this site would provide a very large amount of new housing (c.4,500), including the potential to deliver 40% affordable housing. Significant effects against this objective have therefore been predicted.	✓✓
14	Sustainable prosperity	As this site should provide a large amount of additional housing, this increased number of residents in the town would make facilities and shops more viable.	✓
15	Employment and skills	Provision of the housing associated with this site could help the local economy and encourage provision of local services. The site also includes two local centres which could offer employment opportunities.	✓

### P23 Question 3

#### Have we taken account of all relevant studies and reports as part of our Issues and Options work?

The reference in 3.7.3 "We have also taken into account the content of the Government consultation on 'Planning for the right homes in the right places' (September 2017)" is incompatible with the fact this current proposal was approved by the Council before the end of the Government consultation.

The principle of removing land from the Green Belt must continue to be informed by clarification of the National Planning Policy Framework (NPPF), and this must be acknowledged in Para. 3.7.4. An example of such clarification is provided in the letter from Brandon Lewis MP Minister of State for Housing and Planning 7th June 2016 to colleagues, which was cited in the letter of 24th June 2016 from CPRE Herts. to the Chief Executives of Hertfordshire Local Planning Authorities. The following paragraph is an extract from Mr. Lewis's letter.

"The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries. "

Also in a letter from Brandon Lewis of July 11th forwarded to DEF Chair Gruff Edwards by Dacorum MP Mike Penning:

"We have made clear that constraints such as Green Belt may limit the ability of an authority to meet its housing needs in full. Indeed there have been instances when the Planning Inspectorate found a Local Plan sound even though not all local housing need would be addressed because of these constraints."

**3.7.3** The National Planning Policy Framework (NPPF) provides the main context for local plans. It also provides guidance for decision-making in the absence of relevant local planning policies....The content of the NPPF is due to be revised shortly, to reflect changes suggested within the 2017 Housing White Paper ('Fixing the Broken Housing Market'). We have also taken into account the content of the Government consultation on 'Planning for the right homes in the right places' (September 2017).

**3.7.4** Further details regarding how Government wishes Councils to address issues within their Local Plans is set out in Planning Practice Guidance (PPG). This is a web-based document that is updated on a regular basis. The Government also publishes additional topic-based guidance as appropriate such as that relating to Caravans and Houseboats (Draft, March 2016) and Planning Policy for Travellers (March 2015).

*Local Plans should avoid repeating policies that are already covered by national policy and guidance and not duplicate matters covered by other legislation.*

**3.7.5** There are also a wide range of documents prepared on a county or local level which we need to take into account. These include:

Local Plan – Issues & Options – November 2017

Perfectly Placed for Business (Hertfordshire Local Enterprise Partnership);

Hertfordshire Local Transport Plan;

South West Hertfordshire Growth and Transport Plan (emerging); and

Hertfordshire Biodiversity Action Plan.

### 3.8 Evidence Base

All documents supporting this Local Plan are available to view on our website via [www.dacorum.gov.uk/planningpolicy](http://www.dacorum.gov.uk/planningpolicy)

## P27 Question 4

**Do you agree with the suggested vision for the Borough?**

### **DACORUM 2036: A VISION**

#### ***How things could be with our new Local Plan in place***

Dacorum is recognised as a happy, healthy, prosperous and safe place in which to live, work and enjoy. The natural beauty of the Chiltern Hills and the varied character of the countryside is admired and cherished. The countryside is actively managed and supports a healthy local economy and diversity of wildlife. Water quality in the rivers is good and towns and villages have sufficient water supply. Local housing needs have been met, with the impact on the countryside minimised through making effective use of previously developed land in the towns and villages. The growth and regeneration of Hemel Hempstead continues, with further improvements to the town centre, the Apsley and Two Waters area and Maylands Business Park. The town is fulfilling its potential as a sub-regional business centre, with the Enterprise Zone supporting the green technology sector. The market towns of Berkhamsted and Tring and the large villages provide the necessary services for their communities and surroundings. The economy is buoyant and all parts of the borough have local employment opportunities, which are both varied and accessible. Communities are inclusive and healthy. Minority groups are an accepted part of culture and diversity.

New homes are affordable and cater for the needs of the population. Open space, facilities and services are accessible. New schools have opened and access to the Watford Health Campus is improved. Public transport is more widely used and provision for pedestrians and cyclists has improved. Differences in the character of each place are recognised and valued. Developments reflect local character through their design, and sustainable methods of construction are the norm. Special features, such as the Grand Union Canal, remain an active part of the heritage of the borough. The wider historic environment is valued and protected.

The Vision should carry forward the long-standing commitment of Governments to protect the Green Belt. The constant, visible presence of Green Belt land around the towns, and the support it has received over the decades from successive Secretaries of State, has provided them with the security of knowing that their identities will remain protected and distinct, within a much loved, valued and rare type of countryside. It must be possible to live in Hemel Hempstead and the other towns and to remain aware of the beauty of the countryside that surrounds them. Hemel Hempstead is very much a town existing within the countryside. It is an ancient market town that has expanded vastly, but it has managed, on the whole, to preserve and cherish the best of its landscape features - its woods, its small, steep fields, and its many hedgerows.

The Green Belt was established as a permanent check on the spread of the towns and villages of Dacorum. This permanence is the Green Belt's essential feature, whose purpose is to preserve the countryside as a resource for enjoyment by this generation and succeeding generations of the towns' inhabitants. The many thousands of people who migrated from London did so knowing that the Green Belt was there as a guarantee, backed by government at all levels, that they would not be exchanging one endless conurbation for another. The principle of dry valleys acting as "green wedges" leading uninterruptedly from within the town to open countryside, was an essential feature of the original Hemel Hempstead Development Corporation Master Plan.

The importance of permanent Green Belt boundaries was reiterated in policies in the Herts Structure Plan reviews of 1991 and 1996 and in the Dacorum Local Plan in 1995:-

The County Council Structure Plan review of 1991 (Para. 7.2.8) said that "in defining these (Green Belt) boundaries regard was generally had to the degree of long-term expansion of each built-up area in the context of the stated purpose of the Green Belt."

The Deposit version of the Structure Plan in 1996, said that there should be "no room for urban sprawl and other development on the edge of towns which take up green fields but do nothing to improve the town".

The Local Plan of 1995 stated that "The existing Green belt boundary is generally appropriate for the long term".

Re: "the impact on the countryside minimised through making effective use of previously developed land", the Foreword states that the Core Strategy and

associated documents enable the Council to 'stop inappropriate development'. This is laudable, but in practice our experience of the current Core Strategy would suggest that inappropriate development has not been sufficiently held in check, and that a new commitment to do better is required here. One example is the Green Belt surrounding Upper Bourne End Lane, which has developed because of the lack of rigorous enforcement and developers' outwitting the Council in the case of the Dog Day Care centre and Bovis's landfill under the guise of soil improvement. The balance of power is in danger of shifting further, with the Council's ability to control is weakened, while that of the developer is strengthened. (e.g. through their lobbying for squeezing more housing into LA3 at the cost of green space, including the Wildlife Corridor for Shrubhill Common LNR).

A suitably pleasant, planned and presented green corridor encircling Hemel Hempstead, possibly with radial extensions, for instance along the Bulbourne and Gade, would enhance the attractiveness and prestige of the Borough, attracting visitors who currently may come for Jarman Park and its Ski centre and little else. Hemel, the town with the largest population in Hertfordshire - 100 thousand - deserves it. It would also contribute to local wellbeing. Locally based Health Walks are already very popular, with an attendance of around a hundred not untypical.

The route could start from the Two Waters fishing lake, via the Water Gardens, Gadebridge Park and Halsey Field. Existing footpaths from there cross Boxted Road and lead to the Chiltern Way/Wildlife Corridor abutting LA3, Shrubhill Common Local Nature Reserve and on to Boxmoor Common.

The route could be promoted using informative brochures, and should be adapted for disability access, as is currently underway in Gadebridge Park.

Re "Local housing needs have been met". This is laudable, but the rest of the consultation document implies that releasing Green Belt land is the way to achieve it. Dacorum's waiting list is due to a crisis of affordability, not simply of land availability. Affordability percentage targets have been missed in the past, and there is no reason to suppose that they will not be missed this time also. Research by the Campaign to Protect Rural England showed that since 2009 only 16% of houses built on Green Belt outside of local plans were classed as affordable, and nearly three-quarters of the housing proposed on land to be released from the Green Belt will be unaffordable for most people living in the local area.

The Vision should acknowledge this by reference to policies including:

- Stopping the use of viability assessments by developers to undercut their affordable housing requirements.
- Incentives and enforcement on slow build-out rates. To ensure developers' existing commitments are met before further land is released.

Proposals to remove land from Green Belt protection on such a massive and unprecedented scale should acknowledge that other than those current residents of Hemel Hempstead who will move to the new housing estates, or who will obtain

employment directly therefrom, the developments will not benefit any residents of Hemel Hempstead, and many will be adversely affected, primarily because of:

- Loss of the visual and other amenity of urban green spaces and Green Belt countryside.
- Exacerbation of existing traffic congestion.
- Extra pressure on local amenities, particularly GP Surgeries and secondary schools.

- and that specifying "Flagship Developments" which raises the profile and image of the town might go some way to compensating for these losses. This principle should result in a presumption in favour of the highest level of sustainability in building standards.

### **P38 Question 11**

#### **Do you agree with the proposed approach to selecting sites?**

Re "Greenfield Sites" 5.4.13 and "As brownfield sites are a finite resource, it is likely that we will need to rely more on greenfield opportunities", the fallacious implication is that Greenfield Sites are an infinite resource. Unless the cycle of new housing demand figures leading to further massive losses of greenfield sites is challenged those sites too will be seen to be finite. A characteristic of this cycle is that sites ruled out on by the environmental assessments of one generation of planners and inspectors are re-assessed and downgraded in value by subsequent, often external, assessors, a process of softening them up for development. The history of West Hemel Hempstead (now LA3) illustrates this:

The pre-deposit consultation Technical Report 3 of the Dacorum Borough Plan first review to 2011 assessed five parcels of land (A to E) collectively termed "West Hemel Hempstead", of which only parcel A (400 Houses) was selected for the then-proposed development strategy. Parcel B was seen as "a natural area for open space linking with Shrub Hill Common", while Parcels C, D and E were "considerably more prominent" (than Parcel A) "and should remain undeveloped". Parcel A was "the most suitable for development as it is very well screened in long views - - - However it is prominent in views from Fields End Estate".

The original selection of Parcel A by the Borough proved, at the subsequent Examination in Public at County level, to be a bridgehead for the developers to press their case for even more housing at West Hemel Hempstead, increasing what was already (at that time, but dwarfed by proposals in the current consultation) the largest Green Belt land take in the Borough to include most of the other, previously-rejected parcels, including the "natural area for open space linking with Shrub Hill Common". This demonstrates clearly that the original decision to select even Parcel A, and thereby to breach the long-established urban boundary was a mistake, because once the line was broken, the whole area was rendered vulnerable.

Now LA3 comprises all of Parcels A to E.

## **Brownfield Sites**

**5.4.9** The Government encourages the use of brownfield sites ..... a large number of these brownfield sites have, or are being, developed, with 84% of new homes since 2006 having been built on brownfield sites. However, more recently this level has dropped, as the availability of brownfield sites has reduced.

**5.4.10** ... Government expects us to demonstrate that we have fully explored such sites before Green Belt sites are considered.

**5.4.11** The continued ... redevelopment of brownfield sites, will be a crucial part of the new Local Plan. In particular, there is considered to be scope to accommodate around 1,130 new homes as part of regeneration of the Two Waters and Apsley area of Hemel Hempstead.

**5.4.12** However, even if we encourage higher densities / taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or densities to fully meet our future growth needs.

## **Greenfield Sites**

**5.4.13** Greenfield sites are undeveloped sites in both the urban areas and in the countryside. As brownfield sites are a finite resource, it is likely that we will need to rely more on greenfield opportunities in the future. Such sites can offer greater opportunity for large-scale developments or uses that would be difficult to accommodate in the urban areas.

**5.4.14** Whilst it is important to keep areas of open space within our towns and villages there may be some greenfield sites that could be developed. However, many greenfield sites are covered by other planning designations – such as the Green Belt, or landscape and environmental designations, such as the Chilterns Area of Outstanding Natural Beauty (AONB) and Wildlife Sites. These constraints will all be very important factors in assessing where new development should be located.

**5.4.15** It may not always be possible to deliver very large greenfield developments within the timescale the new Local Plan covers, but we can consider “safeguarding” these sites

for development beyond the plan period.

**5.4.16** Whilst this Issues and Options document does not make final decisions about which sites will be chosen for future development, we have begun this assessment process. The assessment for sites that could accommodate 50+ new homes is contained in the draft ‘Schedule of Site Appraisals’ (October 2017)

## **P39 Question 12**

**Do you think that we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?**

**5.5.1** Government policy requires plans to direct future growth to ‘sustainable locations’ which enable maximum use to be made of public transport, cycling and walking.

**5.5.2** We consider that the key transport issues within Dacorum are as follows:

Poor east-west public transport links;

Capacity of strategic and local road network;

Capacity of Euston to Glasgow (West Coast main line) railway;

The poor quality of some of our railway stations;

The ongoing reduction in local bus services and increasing fares;

Balancing the needs of car and other road users (i.e. pedestrians and cyclists); Ensuring appropriate levels of parking are provided with new development; and Impact of expansion of Luton airport (particularly for those areas under the flightpaths).

**5.5.7** Modelling undertaken for the Core Strategy and Site Allocations DPD indicate that the additional traffic generated through new development can be accommodated on the road networks (subject to some improvements to key roads and junctions).

**5.5.8** The need for further new or improved transport infrastructure to support the additional growth that our new Local Plan will include will become clearer once the preferred locations for growth have been finalised. We have asked for a run of the COMET model to be carried out to provide an initial assessment of the impact of the middle growth scenario (Option 2C section 10'How this future growth could be accommodated' ).

#### **Parking**

**5.5.9** We are currently reviewing our parking standards. This review will inform new parking guidance, which we will consult on separately.

#### **P48 Question 16**

**Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?**

**a) The Government's draft figure of 602 homes a year**

**b) The figure of 756 homes a year**

**c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula;**

**or**

**d) Another figure (please specify).**

Dacorum's figure should be no higher than the 430 p.a. for the plan period (2006-2031) of the Pre-Submission Core Strategy of November 2011.

It is noted that the Borough is being required to build houses because of Government pressure. The housing crisis in London is due to several factors, not only shortage of houses, but prices that put them beyond the reach of most Londoners. Speculative rental investment by non-occupying owners, unoccupied houses owned by overseas investors, and a rental market dominated by easy access to buy-to-let mortgages, all contribute to inflated house prices and the housing crisis that we are currently experiencing. It is not the role of Hemel Hempstead to pick up the tab for this situation.

All the figures in the current consultation can be traced back to Office for National Statistics (ONS) forecasts. Specifically, under "Calculating Local Housing Need" (6.1.10) a figure of 756 p.a. from the SHMA (Strategic Housing Market Assessment) is quoted. The SHMA contains (4.18 Page 39) "The most up-to-date projections are the 2012-based CLG Household Projections published in February 2015. These projections were underpinned by the ONS (Office for National Statistics) (2012-based) Sub national Population Projections (SNPP) – published in May 2014." The ONS Website says that this (published in May 2014) is not the latest release. Their forecasts in any case always admit ranges of uncertainty, particularly as to the levels of net inward migration to the UK. Over the next 10 years, ONS expects 54 per cent of population growth in the UK to be caused by net migration, but past predictions

have been hopelessly wrong and current predictions are fogged by political uncertainty, particularly in view of the unknown effects of Brexit on immigration, and of a nearby Oxford – Cambridge corridor on housing demand. In addition to its “principal” projection. ONS produces “variant” projections, reflecting the effects of changes in the various factors underlying population, such as fertility rates and proportion of younger people (i.e. of childbearing age) in the overall population. For 2041, the highest projection among these is 77m people, the lowest is 67.3m. These uncertainties should be contrasted with the certainty and permanence of the loss of Green Belt and urban green space once the development based on those predictions has taken place.

*In the October 2017 National population projections, which are 2016-based and slightly lower than the previous ones, the Office for National Statistics ascribes the lower projections to a number of factors, including reduced net immigration, lower than anticipated fertility and more modest increases in longevity than previously anticipated. Over the next 10 years, it expects 54 per cent of population growth in the UK to be caused by net migration where past predictions have been hopelessly wrong and current predictions are fogged by political uncertainty. ONS estimates that Population growth in the next 25 years will be lower than in the last 25 years: 7.3m until 2041, compared to 8.2m between 1991 and 2016.*

*Our infrastructure and our public services already face mounting and unbearable pressure for at least another century. When one considers the huge range of variant projections for population growth in both short and long terms, it is clear that multiple factors contributing to population growth offer the Government multiple levers to affect it. A joined-up strategic policy for sustainable population in the UK is needed now more than ever.*

See P46 under "Calculating Local Housing Need" the conclusions from the SHMA (Strategic Housing Market Assessment) Total homes in Dacorum 2013-2036 = 17,388 = 756 p.a.

(Based on South West Hertfordshire Strategic Market Housing Assessment (SHMA ) (2016)) This contains (4.18 Page 39)

"The most up-to-date projections are the 2012-based CLG Household Projections published in February 2015. These projections were underpinned by the ONS (Office for National Statistics) (2012-based) Sub national Population Projections (SNPP) – published in May 2014. Planning Practice Guidance specifically outlines that “The 2012-2037 Household Projections were published on 27 February 2015, and are the most up-to-date estimate of future household growth.”

The ONS Website says that this (published in May 2014) is not the latest release, which is 2014-based.

See also P47-P48 which refer to the Government report 'Planning for the right homes in the right places' and give an explanation of the 602 and 1,100 homes p.a. figures.

See also P48-P49: "Issue 9 – What land is available for the new homes needed?" Assumed housing capacity (2013-36)\* consistent with existing planning policies = 10,940

## **Question 17 Do you agree with the proposed approach to affordable housing?**

No. See our responses to Questions 16 and 36.

### **P71 Question 25**

#### **Do you support the proposed approach to the natural environment?**

The Issues and Options consultation refers to the Sustainability Appraisal Scoping Report (March 2017) to which DEF responded at length in May, though we have yet to find the summary of consultation responses referred to in the accompanying Schedule of Site Appraisals Working Note.

Overall the Scoping Report scores well in its aspirations, and as such deserves to be an "equal partner" with the Local Plan.

A case in point is the preservation of wildlife corridors in the face of Green Belt development. It is important to have a policy regarding the preservation of properly functioning Green Corridors within any proposed developments.

Guidelines issued by English Nature state that Wildlife Corridors should:

- be preserved, enhanced and provided, where this can be cost-effective, as they do permit certain species to thrive where they otherwise would not
- corridors should be as wide and continuous as possible
- their habitat should match the requirements of the target species.)

The target species should be those that are currently found, or potentially found pre-development. An ideal Wildlife Corridor would therefore preserve and/or enhance existing native hedges with strips of grassland, which should be mown 1/3rd at a time, once per year. Grass footpaths could be mown more frequently.

An optimum arrangement for a Wildlife Corridor would combine a swathe of grassland not otherwise used for public recreation, (except as a visual asset, and a mown footpath).

In instances that are outside DBC's direct control the Sustainability Framework should contain policies to promote the use of renewable resources, protect natural resources and reduce waste.

There appear to be some topics that are missing both from the Sustainability Appraisal and from the Options and Issues consultation that should be included. Searches for the words "fly-tipping", "litter" and "graffiti" find nothing. All of these activities are spiritually detrimental to the majority of Dacorum's population.

8.1.1 As part of preparing the new Local Plan a range of issues relating to the natural environment must need to be considered and will inform the way the Plan is shaped. All are considered in more depth within the Sustainability Appraisal Scoping Report (March 2017) and the Sustainability. Appraisal working notes (October 2017) that accompany this Issues & Options document were prepared by our independent sustainability consultants TRL.

#### **Landscape Character**

8.1.2 The Landscape Character Assessment describes the main types of landscapes across Dacorum and gives advice about the management and planning of these. The majority of Dacorum falls within the 'Chilterns' national character area. A large section of this is protected as part of the Chilterns Area of Outstanding Natural Beauty (AONB). Its special qualities, which we are required to help conserve and enhance, include the steep chalk escarpment with areas of flower rich chalk downland, beech woodland, commons, tranquil valleys, chalk streams and villages with their distinctive brick and flint houses.

### **Environmental Designations**

8.1.4 Within the wider landscape, Dacorum contains a variety of different environmental designations. These comprise a mixture of Local, National and European designations..

8.1.5 Special Areas of Conservation are designated under European Habitats Directive, and are areas of especially high wildlife and habitat value. The designation within Dacorum covers two areas of Chiltern Beechwoods – the largest covering the Ashridge Estate and a smaller area at Tring Park. Growth within Dacorum could increase the number of people using these areas for recreation, the the new Local Plan will need to try to reduce the negative impacts this could have on the woodlands.

8.1.6 Sites of Special Scientific Interest (SSSIs) comprise land which is nationally important in terms of its flora, fauna or geology. The SSSI designation sometimes applies to sites which are also subject to local designations, such as Wildlife Sites, Regionally Important Geological Sites (RIGS), or Local Nature Reserves. There are 8 such sites in our area.

8.1.7 There are over 230 Wildlife Sites within the Dacorum, covering meadows, ponds, woodland, urban green space and geological sites. Important geological features are also designated as RIGS.

8.1.8 Local Nature Reserves (LNRs), of which Dacorum has 6, have wildlife or geological features that are of special interest locally.

### **Our proposed approach**

8.1.9 The Core Strategy sets a framework to consider proposals which affect the natural environment and to protect and enhance what Government calls 'valued landscapes.' It is our intention to take forward these existing policies, expanding them where necessary to pick up more detailed issues currently covered by policies in the 2004 Local Plan. The policy covering the AONB will need to be reviewed to ensure it reflects the content of the latest AONB Management Plan prepared by the Chilterns Conservation Board. This Management Plan identifies a number of pressures on this important landscape due to increased visitor numbers, the impact of development in areas surrounding the Chilterns, increased water extraction, the erosion of traditional farming practices such as grazing, and the influence of climate change.

8.1.10 We will also review the current policy relating to 'Sustainability Offsetting', where development provides off-site rather than on-site compensation for loss of biodiversity or increased carbon emissions. This is to see if it needs to be changed in the light of emerging good practice and advice from our ecological advisers at the County Council.

8.1.11 The Herts and Middlesex Wildlife Trust have carried out work to identify ecological corridors and how they can be protected. We will consider how we can incorporate this work in the new Local Plan and through any master plans prepared for key development sites.

8.1.13 Please see section - 9 '**Infrastructure**' for further consideration of provision and enhancement of 'Green Infrastructure' within Dacorum.

### **P73 Question 27**

**Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?**

Although Section 8.3.9 acknowledges that "The Bulbourne and Gade are Chalk Streams that are recognised as being of national importance and so are very vulnerable to the effects of pollution, climate change and over-abstraction", it does not say that these are **rare** features on a world scale, supporting a distinctive ecosystem and that therefore they must be specially protected.

Dacorum is in the west of the eastern region and therefore has a much higher rainfall (810mm average per annum) than the east of the region (600mm average per annum), but we still have an over abstraction problem, to which the Plan should pay more attention. In particular there is no plan to mitigate the effect of further housing developments which could cause the Gade and Bulbourne to dry up, e.g. by considering other sources of water.

The Plan needs more emphasis on river pollution (chemical and sediments) from major and minor road drains and should contain policies to tackle it.

The section on flooding does not emphasise that much of the minor flooding is caused by a failure to keep drains clear, and contains no policies or commitments to improve this.

The Plan should incorporate aspirations in the Sustainability Appraisal Scoping Report strengthened as follows:

2.9.4 Issues and opportunities: the 7th bullet is not strong enough. There should be a policy of 'ensuring' rather than merely 'encouraging' SUDS, because an aspiration phrased as proposed can be simply ignored by developers.

2.9.5 Sustainability appraisal objectives and sub-objectives: The third bullet "To improve ecological status and flow of rivers and encourage practices which reduce nitrate levels in groundwater" should contain specific proposals and policies as to how this will be achieved.

The Plan should declare a policy of promoting a 'circular economy' of materials with minimal or no destruction of them. Counting energy generation from incinerators as 'renewable', 'sustainable' or part of a 'circular economy' is misleading, while the extraction of metals from incinerator bottom ash rather than from collected waste for 'recycling' is wasteful. The residual materials (from local sorting) should be put through local facilities of cleaning, sorting and baling. Organic wastes should feed composting and anaerobic digestion plants, with their by-products of heat, electricity and gases. This would promote local employment.

**8.3.1** National guidance requires us to adopt proactive strategies to reduce and adapt to climate change, taking full account of flood risk, water supply and demand considerations

#### **Flood risk**

**8.3.2** National guidance states that development in areas at risk of flooding should be avoided. Dacorum has two main Rivers –the Bulbourne and the Gade – plus a small stretch of the River Ver in the Markyate area. There are also other areas at risk of flooding, such as around Tring reservoirs.

**8.3.3** The current SFRA (Strategic Flood Risk Assessment ) Stage 1 report (completed August 2007) covers four councils (Dacorum, St Albans, Three Rivers and Watford). As a result of recommendations in the Stage 1 Report, a Stage 2 study (June 2008) was carried out to look at the River Gade at Hemel Hempstead and modelling of the Grand Union Canal at Berkhamsted. The Stage 2 study concluded that there were only three areas at risk of flooding:

Hemel Hempstead Town Centre,

Moor End Road, Hemel Hempstead; and

Two Waters Road (south of the roundabout), Hemel Hempstead.

The study also suggested that land between the Grand Union Canal and the River Bulbourne in Berkhamsted would be severely inundated with water if a breach of the canal occurred.

**8.3.4** Our SFRA will be updated later this year to reflect revised flood zone mapping provided by the Environment Agency. The conclusions of this new study will be an important factor in deciding where to locate new development .

**8.3.5** For further discussion of issues relating to water infrastructure, please refer to Section - 9 ' **infrastructure**'.

#### **Pollution and waste management**

**8.3.6** the planning system has a key role to play in seeking to limit impacts of pollution in all its forms – whether from noise, light, fumes, chemicals, other hazardous substances or waste in general.

**8.3.7** Whilst air quality in Dacorum is generally good, the main source of pollution comes from traffic emissions. In 2012 three areas were designated in Dacorum as Air Quality Management Areas (AQMAs) as a result of nitrogen dioxide exceeding accepted national standards. These AQMAs cover parts of Lawn Lane and London Road in the Apsley area of Hemel Hempstead, and the High Street in Northchurch. We need to ... ensure existing air quality issues are not worsened

**8.3.8** Special consideration needs to be given to noise and light pollution, with tranquillity and dark skies especially important characteristics to preserve in the Chilterns AONB.

**8.3.9** The Bulbourne and Gade are Chalk Streams that are recognised as being of national importance and so are very vulnerable to the effects of pollution, climate change and over-abstraction.

**8.3.10** Our soil ... must be protected from erosion and contamination. High quality agricultural land is a particularly important resource.

In some instances, new development can actually help improve the quality of contaminated land.

#### **Our proposed approach**

**8.3.11** Policies that seek to ensure all new development limit their impacts on natural resources and minimises all forms of pollution will be carried forward into the new Local Plan. Development will be avoided in areas at greatest risk from flooding.

## **P74 Question 28**

Building Regulations are the minimum standard required. The Council should strongly request developers to aim for standards in line with the former "Code 6"

**Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies?**

**8.4.1** Local Plans can help us reduce greenhouse gas emissions and encourage us to change our behaviours through: Planning for new development (in the most accessible locations and through the materials or appliances chosen); and Actively supporting energy efficiency improvements to existing buildings.

**8.4.3** In March 2015, Government withdrew all national sustainable design and construction standards (BREEAM and the Code for Sustainable Homes) that applied to all new residential development. Since this time, Building Regulations assess whether residential development demonstrate appropriate design and construction standards. In light of this change, we will cease to set such requirements for residential development as this would duplicate the Building Regulations process and Government no longer allows us to set tighter standards through the Local Plan process.

**8.4.5** ... we will encourage and guide developments to the most accessible locations in Dacorum (see section - 5 '**Our towns, villages and countryside**') and support the use of site waste management plans.

**8.4.6** Further design features can be incorporated into new developments, such as District Heating.

**8.4.8** Our Plans currently highlight areas where there could be opportunities to include district heating schemes ...

### **Our proposed approach**

**8.4.9** As a result of Government changes, we intend to cease referring to some standards relating sustainable design and construction that were within the Code for Sustainable Homes and instead use the replacement requirements within the updated Building Regulations.

## **P81 Question 29**

**Do you agree that we have covered all relevant issues relating to physical infrastructure?**

The current traffic congestion, inaccessible hospital services (specifically those at Watford General hospital, including A&E) and depletion of water supplies in the Bulborne and Gade, indicate that even the lowest figure of 13890 extra houses is unrealistic, if the District is to retain the attractive image of which it is proud. Far from presenting a vision of the future, the Plan seems to be propose a nightmare.

In particular, there should be a commitment to restore flow rates in the Gade and Bulbourne to their historic levels, in order to guarantee the survival of these globally rare habitats.

## **Transport Infrastructure**

**9.1.1** An overview of the issues relating to transport connectivity, policies, the way we travel and transport modelling are given in section - 5 'Our towns, villages and

countryside'. Both this Council and the County Council's aim is that people should be able to access homes, jobs and recreational facilities not only by using private cars, but also through the increased use of the train, bus and footpath/cycleway networks. A number of improvements will be necessary to the transport network to ensure that it remains fit for purpose.

#### **9.1.2**

This work will often extend beyond our immediate boundary. Key cross-boundary transport schemes include the A414 corridor project, which extends from our area all the way eastwards to Essex, and the Maylands Growth Corridor project, which will deliver road improvements at east Hemel Hempstead and involves land within both Dacorum and St Albans Council areas.

### **Water and Sewerage**

#### **9.1.3**

The Council has worked with neighbouring authorities and infrastructure providers and will continue to do so as our Local Plan moves forward. The Water Cycle Study considers the capacity of water infrastructure across South West Hertfordshire to aid decisions for growth onto the future. It identifies the challenges in water supply and the need for improvements to Waste Water Treatment Works and associated infrastructure. The Council, water companies and developers will work together to ensure that investments are made in water and sewerage infrastructure and that essential new infrastructure is delivered.

### **Power**

**9.1.5** We will work with gas and electric suppliers to ensure that their networks have sufficient capacity to accommodate future growth.

### **P83 Question 31**

#### **Do you think that we have covered all issues relating to green infrastructure?**

This should include the preservation of the quality of experience of footpath users, particularly when large developments take place. Criteria should be:

- Minimal diversion of route,
- Maintenance of rural footpath character (i.e. pedestrian-only use, no tarmac, garage forecourts, urban pavements, playing field equipment or pitches),
- Extra tree lines to protect, and means of preventing motorcycle and flytipping access.

**9.3.1** The term 'Green Infrastructure' (GI) refers to the network of protected sites, nature reserves, green and blue spaces (lakes, rivers and other waterways), leisure and recreational spaces (including sports centres) and open space links within both towns and the countryside. It can sit within both the urban and rural landscape. The quality of green spaces in Dacorum attracts people and families to live, work and play here. ...it is important to recognise that the natural and historic environment may need further protection and enhancement through the Local Plan ...

**9.3.2** Our Core Strategy seeks to protect and manage 94 key areas of open space (greater than 1 hectare) as designated open space. This provides a structured approach to planning for green spaces which are not covered by other designations, such as Green Belt, Tree Preservation Orders, Listed Buildings or Conservation Areas.

**9.3.4** We will also need to ensure that opportunities to improve existing green infrastructure, and to provide new green infrastructure as part of new development, are maximised.

### **P91 Question 33**

**Do you agree that the three growth levels proposed are the most reasonable to consider?**

No. See reply to Question 16. The figure should be no higher than 430 p.a.

**10.1.8** Feedback is sought on the following three levels of future growth:

#### **Option 1: Draft Government figure**

*Amount:* This would equate to 602 homes a year or 13,846 over the 2013-36 plan-period.

*Reason:* This is above the current target set out in the Core Strategy (430 homes a year), but is considered to be a reasonable target based on local evidence – particularly from the SHLAA and Green Belt studies. The level broadly matches the number of homes that could be built on land within existing town and village boundaries, or that is already allocated or expected to come forward, plus some limited Green Belt land. The amount of Green Belt land needed in this option broadly equals the amount of land the Green Belt study identified as not fully meeting the Government's criteria for continued Green Belt designation. It also equates to the draft figure contained in the Government consultation on 'Planning for the right homes in the right places' (September 2017). However, a plan based on this level of housing growth would not meet full locally assessed need, as set out in our SHMA, and would be considerably below the figure arising from the Government's new standard formula which is proposed to be used in areas where the current Local Plan or Core Strategy is more than 5 years old (see below).

#### **Option 2: Locally assessed need**

*Amount:*

This would currently equate to about 756 homes a year or 17,388 over the 2013-36 plan-period.

*Reason:*

This is significantly above the current target set out in the Core Strategy (430 homes a year), but reflects the conclusion of the South West Hertfordshire Strategic Housing Market Assessment (SHMA) came to about the real level of local housing need.

#### **Option 3: Upper Government figure**

*Amount:*

This would equate to about 1,100 homes a year or 25,300 over the 2013-36 plan-period.

*Reason:*

This is very significantly above the current target set out in the Core Strategy (430 homes a year) and the locally assessed housing need figure (Option 2). However, it is important to include a growth option higher than our current locally assessed need level, as the need figure may increase significantly above its current level (Option 2) as the plan progresses. A figure of this level would however be extremely hard to achieve as it would require the use of almost all sites submitted to the Council for consideration - irrespective of whether we assess them to be suitable for housing or not.

The option has ... been put forward as an alternative for consultation purposes as the figure of around 1,100 homes a year figure broadly equates to the level of need that would be generated were the Government's new draft standard formula for assessing housing need to be applied to Dacorum.

#### **P91 Question 34**

**Do you agree with the rejection of the following growth levels:**

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

No. See reply to Question 16. The figure should be no higher than 430 p.a. However, we agree with the rejection of (2) and (3).

#### **Rejected Growth options**

**10.1.9** We could of course consider planning for both higher and lower housing growth levels, such as:

Continuing the current housing target (430 homes a year);

'Urban Capacity' option - no new greenfield sites apart from existing proposals (476 homes

a year); and

Significantly above the upper Government figure (1,100+ homes a year).

**10.1.10** However, these are not considered to be reasonable alternatives for the reasons set out in section 'Appendix B: Reasons for rejecting alternative growth levels' and so we propose to reject them from further consideration.

#### **Question 36 Do you support the proposed locational principles?"**

No. To invoke the Government's recently concluded consultation "The Right Homes in the Right Places", the "Right Homes" are for those people living in Dacorum in need of homes. There are currently around 5600 households on DBC housing list (The Gazette, November 8<sup>th</sup> 2017, page 2), and even including the "B list" this number would be about 11200 (The i newspaper, Monday 23rd October). The potential for developing on non-green belt housing sites in Dacorum ("Identified housing capacity") is about 11000 houses, (DBC Local Plan, November 2017 page 94)) meaning that very few homes need to be built on green belt land.

In order to address the housing crisis, the "Right Homes" are not those unaffordable by people in housing need, and that can only be purchased by those that are moving up the housing ladder. Neither is it necessary or desirable to build non-affordable homes in the Borough to attract people from other areas.

The "Right Place" is not the Green Belt, and indeed the Communities Secretary Sajid Javid has said "There is no need to build on green belt land" (The i newspaper, Monday 23rd October).

#### **P100 Question 39 (etc)**

**Is Option 1A your preferred option for delivering the growth needs of the Borough?**

No, the table should be re-worked within the constraints of the lower overall figure given in our reply to No. See reply to Question 16.

10.4 Issue 28 - What are the growth options?

10.4.1 For the reasons set out above, seven Growth Options are put forward for consideration.

10.5'Option 1' ('Draft Government figure') and 10.6'Option 2' ('locally assessed need') can both be delivered via three different suggested locational distributions. Due to the larger number of sites required for 10.7 'Option 3' (Upper Government figure), there is only one possible locational distribution, as it would require promoted sites across the whole Borough.

**10.4.2** For each alternative, a map indicates in a blue circle the amount of development that would be needed (if any) within the Green Belt. This is on top of the existing identified housing capacity we have assumed for each place. This existing capacity figure is shown in a yellow circle and summarised below.

	Hemel Hempstead	Berkhamsted	Tring	Bovingdon	Kings Langley	Markyate	Remainder	Total
<b>Capacity*</b>	8,900	600	500	90	50	200	600	10,940

***Growth options – Green Belt housing numbers***

<b>Option1</b>	<b>–</b>	<b>Draft</b>	<b>Government</b>	<b>figure</b>				
<b>Option1A</b>	1,750	900	300	-	-	-	-	2,950
<b>Option1B</b>	2,980	-	-	-	-	-	-	2,980
<b>Option1C</b>	-	1,075	1,000	410	280	160	-	2,925
<b>Option2</b>	<b>–</b>	<b>Locally</b>	<b>assessed</b>	<b>need</b>				
<b>Option2A</b>	3,675	1,175	1,600	130	-	-	-	6,580
<b>Option2B</b>	4,150	1,075	1,350	-	-	-	-	6,575
<b>Option2C</b>	3,450	1,075	1,000	360	380	160	155	6,580
<b>Option3</b>	<b>-</b>	<b>Upper</b>	<b>Government</b>	<b>figure</b>				
<b>Option3</b>	6,850	2,250	2,667	435	950	600	608	14,360

\* This figure is the same for each Growth Option and needs to be added to the Green Belt housing numbers to give the total growth for each place.

**.P119 Question 46**

**Do you have any feedback on any of the sites contained in the draft Schedule of Site**

**Appraisals or the Sustainability Appraisal working note which accompanies it? (Question 1 is also about the Sustainability Appraisal working note conclusions. See extracts from Question 1 above. See also below EXAMPLE from Schedule of Site Appraisals.)**

Re HH-h1b we very strongly support the recommendation of Schedule of Site Appraisals to "Exclude from further assessment and retain as Green Belt." which

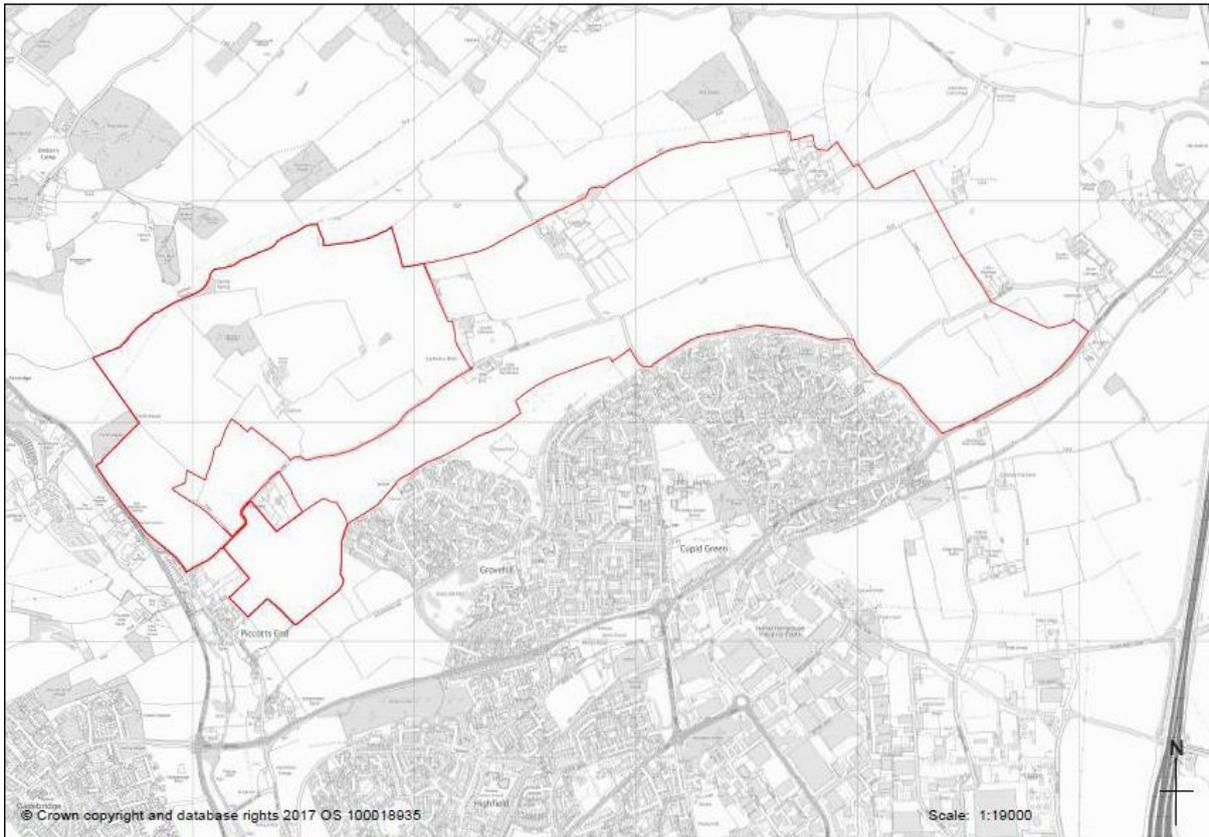
contrasts with TRL's Schedule Of Site Appraisals Working-Note, which is arbitrarily casual, for instance in its classification the Landscape Impact as "likely to have some positive and some negative effects, none of which are significant" and water as "No predicted effects".

The assurance Re Site Reference: HH-h1b - North under "Climate Change" that this site would "require the provision of a range of facilities and services in two local centres (e.g. schools, shops, healthcare facilities) thereby reducing the need to travel for many day to day needs" is not matched by experiences when planning has reached a later stage, by which time the Council seems to have handed over responsibility for such matters to the developers and other agencies, and this would be particularly true for smaller and medium sized sites.

The area is essential in providing a visual background for Hemel's Northern fringes, and in providing a visual buffer for the Upper Gade Valley AONB to its North. It is much enjoyed by users of its footpath and bridleway network. During the Eighties and Nineties three new hedgerows on Wood Farm were planted by volunteers with the express purpose of enhancing the landscape in response to the Council's Urban Edge Study which called for suggestions for such enhancements. The farm manager co-operated in this project, and by designating a Permissive Path link made possible a circular walk from Dodds Lane, which takes in all three hedgerows.

The visual impact of HH-h1 a or b would severely detract from the amenity value of the recently established Halsey Field Wildlife Site just to the north of Warners End Wood . See <http://dacenvforum.org.uk/projects/halsey-field/> and/or <https://www.facebook.com/The-Halsey-Field-Local-Wildlife-Site-Hemel-Hempstead-1106523336038066/?ref=ts&fref=ts>

HH-h2 would impinge on the Halsey Field wildlife site with the loss of woodland adjacent to the site, which acts as a wildlife corridor into the site. HH-h1 and HH-h2 would together totally destroy the amenity value of Public Footpath HH13 from Gadebridge to Piccotts End.



<b>Site Reference</b>	HH-h1b	
<b>Site Information</b>		
<b>Site Address:</b>	<b>North Hemel Hempstead (Phases 1 and 2)</b>	
<b>Area (ha) (gross)</b>	<b>422 hectares</b>	
<b>Current Use(s)</b>	<b>Agriculture, woodland and farm buildings</b>	
<b>Proposed Use(s)</b>	<b>A mixed use residentially led new community.</b>	
<b>Potential housing capacity / density (dwellings per hectare)</b>	<b>4,500 homes at 30 dwellings per hectare. The Crown Estate is in discussions with a range of adjoining landowners regarding site assembly and delivery.</b>	
<b>Promoted by</b>	Landowner	(of part) The Crown Estate
Agent / developer	Sellwood Planning	
Other	-	
<b>Technical Studies Assessment</b>		
<b>a) Stage 2 Green Belt Review and Landscape Appraisal conclusions:</b>	Green Belt parcel number	HH-A1
Recommendation taking into account Green Belt function, constraints and landscape appraisal	Exclude from further assessment and retain as Green Belt.	
Summary of landscape appraisal (landscape sensitivity)	High	
<b>b) SHLAA conclusions:</b>	SHLAA reference	-
Accepted (A) / Rejected (R)	-	
SHLAA adjusted site area	-	
SHLAA adjusted capacity	-	



Health facilities

Transport infrastructure:

- Bus loop
- Cycle/ footpath links
- On-site road improvements
- Off-site road improvements
- Other

Local store / other retail

Community hall / leisure space

Park / playing pitches / allotments / MUGAs

Employment floorspace (A2 / B1 / B2 / B8)

Other

Site Assessment Conclusions

**On and/or off-site**

**compensatory environmental improvements (Green Belt sites only)**

**Key land use issues raised**

The promoter considers that the proposal could create a parkland buffer between the proposed development edge and the AONB. This could include a compensatory SANGS area.

Substantial loss of Green Belt land and major northward expansion of Hemel Hempstead towards Redbourn and into open countryside that partly falls in St Albans district. The site is not identified as an area to be recommended for further assessment as a boundary amendment in the Stage 2 Green Belt study. Potential encroachment/merger of the urban area of Hemel Hempstead with Piccotts End. Furthermore, possible effects on CAONB, the setting of Piccotts End Conservation Area, Listed Buildings, Ancient Woodland, and the Chilterns Beechwoods SAC. The latter may require a Habitat Regulations Assessment (Appropriate Assessment) at this stage which could highlight the need for the provision of Suitable Alternative Natural Greenspace (SANGS) to help take some of the recreational pressure off the SAC. New development will need to respect the conservation area and the key views across the Gade Valley. Main access points can be secured from Leighton Buzzard Road and Redbourn Road. Large-scale development will place significant pressure on local infrastructure, particularly schooling and highways, and cumulatively in conjunction with growth on the north eastern side of Hemel Hempstead in St Albans district (i.e. the Gorhambury development). Lead-in period required to secure land assembly and prepare site for delivery. Thus Phase 2 may deliver beyond the Plan period. The part of site that falls in St Albans district will require joint working to secure this element of the scheme. However, proposal offers opportunity to create a new planned neighbourhood expansion of the town with associated local services and facilities. It is of a size to deliver large-scale infrastructure and contribute to improving transport links, particularly through exploring the

potential to create an east-west link road (connecting Redbourn Road with Leighton Buzzard Road).

The layout of the development will need to take account of the gas mains buffer zone (and potentially the oil pipeline buffer zone if development extends into the St Albans district).

### **Sustainability Conclusion**

Significant loss of greenfield land and potential impact on CAONB, Ancient Woodland, built heritage and archaeology. Development could affect the Chilterns Beechwoods SAC which may require the provision of SANGS to help take some of the recreational pressure off the SAC. The scheme could provide for a parkland buffer between the proposed development edge and the CAONB. This could include a compensatory SANGS area. The site is of a strategic scale to create a sustainable mixed use urban extension to Hemel Hempstead and deliver associated supporting services and infrastructure, and improved public and private transport. It may be of a sufficient size to promote a district heating scheme. The land is reasonably well related to employment and retailing opportunities within and around the Maylands Business Park and existing local centres (Woodhall Farm and Henry Wells Square).

### **Key Pages in Site Appraisals Draft**

P16: North Hemel Hempstead (Phase 1) 1,750 homes at 30 dwellings per hectare. The Crown Estate is in discussions with adjoining landowners regarding a larger phase 1 with potentially a total of 2,250 homes.

P21: North Hemel Hempstead (Phases 1 and 2) 4,500 homes at 30 dwellings per hectare. The Crown Estate is in discussions with a range of adjoining landowners regarding site assembly and delivery.

P26: North of Gadebridge (Land at Piccotts End)  
C.440 dwellings

P30: Land at Shendish, London Road

900 homes at varying densities on selected land parcels within the site, currently envisaged to range from c.30 - 40 dph

P39: Land south of Berkhamsted  
C.970 dwellings

P75: Land to the north of Station Road, Tring  
Up to c. 1000 dwellings.

P86: Land at Icknield Way / Grove Road (New Mill)  
The development capacity is 400 dwellings.

P94: Land at Dunsley Farm, London Road  
37.37 ha, 30dph

P98: Land north of Icknield Way (Waterside Way)  
Up to 300 homes

P102: Land at Grange Farm, Green Lane. Bovingdon  
130 New dwellings, incl. 40% affordable housing  
60 bed Nursing Home

P120 Land at Hill Farm, Love Lane, Kings Langley  
150 - 300 units,

P124 Land at Rectory Farm, Hempstead Road, Kings Langley  
8.0ha

P128 Land to the east of A41 and Wayside Farm, Watford Road, Kings Langley  
Approximately 60 ha, 30-40dph

P133 Land south of Markyate  
up to 150 dwellings

P155 Map of all sites

### **Key Pages in Site Appraisals Sustainability Appraisal**

P7 Summary Table

P21 (example) Site Reference: HH-h1b - North Hemel Hempstead (Phases 1 and 2)