



Dacorum's New Local Plan: Issues and Options Consultation

Comments Form



Please return to Dacorum Borough Council, by midnight on Wednesday 13th December 2017. Comments received after this time will not be considered.

By online consultation portal: If you have internet access, it is recommended that you make your representations online at:

<https://dacorum-consult.objective.co.uk/portal/planning/lp/io/io>

Alternatively you can respond by:

e-mail to: strategic.planning@dacorum.gov.uk

post to: Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

If you have any queries, please contact the Strategic Planning Team on 01442 228660.

This questionnaire needs to be read in conjunction with the relevant sections of the Local Plan Issues and Options consultation document.

You do not need to answer every question: just those that are relevant to you or that you have a view on.

Personal Details

Please note that * denotes mandatory fields

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Please note: Your comments and personal details will be available for public inspection (apart from telephone numbers, email addresses and signatures) and therefore cannot be treated as confidential. **Your name and address must be completed for your comments(s) to be considered.**

Issues and Options Questions:

These are the questions that we would like your feedback on.

Background

Question 1

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

Question 2

Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?

Question 3

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

A vision for the new Local Plan

Question 4

Do you agree with the suggested vision for the Borough?

Question 5

Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovingdon, or the wider countryside?

Question 6

Do you agree with the suggested objectives for the new Local Plan?

Question 7

Do you agree with the proposed policy coverage of the Local Plan?

Issues facing Dacorum when planning for growth

The role of our towns, villages and countryside

Question 8

Do you agree with the proposed broad approach to distributing new development?

Question 9

Do you agree with the proposed approach to Green Belt and Major Developed Sites summarised above?

Question 10

Do you agree with the proposed approach to the Rural Area summarised above?

Question 11

Do you agree with the proposed approach to selecting sites?

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?

Question 13

Do you agree with the approach proposed to ensuring good quality design within Dacorum?

Question 14

Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix a)?

Homes

Question 15

Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market Assessment?

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*)

Question 17

Do you agree with the proposed approach to affordable housing?

Question 18

Do you agree with the proposed approach to planning for specific types of housing?

Question 19

Do you agree with the proposed suggested approach to the timing of site delivery?

Our economy

Question 20

Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?

Question 21

Do you agree with the proposed approach to meeting future jobs growth?

Question 22

Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?

Question 23

Do you agree with proposed approach to meeting future retail needs?

Question 24

Do you agree the proposed approach to encouraging tourism?

Our environment

Question 25

Do you support the proposed approach to the natural environment?

Question 26

Do you support the proposed approach to the historic environment?

Question 27

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

Question 28

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?

Infrastructure

Question 29

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

Question 30

Do you think that we have covered all relevant issues relating to social infrastructure?

Question 31

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

Question 32

Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?

How this future growth could be accommodated

Question 33

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

Question 34

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

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

Question 35

Has the Council considered all reasonable alternative levels of growth?

Question 36

Do you support the proposed locational principles?

Question 37

Do you agree with the rejection of the following growth distributions:

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

Question 38

Has the Council considered all reasonable alternatives for distributing growth?

Question 39

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

Question 40

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

Question 41

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

Question 42

Is Option 2A your preferred option for delivering the growth needs of the Borough?

Question 43

Is Option 2B your preferred option for delivering the growth needs of the Borough?

Question 44

Is Option 2C your preferred option for delivering the growth needs of the Borough?

Question 45

Is Option 3 your preferred option for delivering the growth needs of the Borough?

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?

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Q1 Do you agree with the conclusions reached in the Sustainability Appraisal Working Note that accompanies this Issues and Options document?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓	No	
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Comments

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Which question are you responding to? (see list of questions below)

Question number	Q2 Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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Comments

Section 3.6 gives a commitment to the necessary engagement, but this should have been completed prior to the Issues & Options consultation in order to develop more meaningful options and distribution policies, particularly in assessing the capacity of Tring’s infrastructure to absorb regional growth.

Most notable are:

- Aylesbury Vale District Council’s VALP Proposed Submission. This is significant because:
 - The sheer scale of the development due to take place - Aylesbury Town, itself, will take 16,398 new homes out of the 27,400 new homes required
 - To the west of Aylesbury there are AGT3: Aylesbury north of A41 1,660 dwellings and a large allocation of employment land; AGT4 Aylesbury south of A41 3,111 dwellings; and 1,000 dwellings at Halton Camp. Plans for approx. 3,000 houses at Hampden Fields have recently been approved
 - On a smaller scale but closer to Tring, the plans for Aston Clinton have over 600 houses. It is a well-established fact that residents of Aston Clinton look to Tring for their infrastructure. Similarly there are still 200 homes to be built at Pitstone.
- Significant growth is already underway at Leighton Buzzard and north of Dunstable, and there are 2,000 homes in the Draft Central Bedfordshire Plan for land west of Luton (Caddington)

The sheer scale of this development will put an exceptional strain on the infrastructure of the entire region – a region that wraps around the Tring ‘peninsular’.

The transport implications are of particular concern. The unprecedented expansion of London Luton airport is another factor to take into consideration.

Hertfordshire County Council has issued its draft Local Transport Plan. As presented, this marks a sea-change in policy:

“A move away from a focus on car based investment and capacity enhancement. These are now seen as a last resort because of financial and environmental cost, question marks over their value in the long term, and because they often perpetuate car dependence, unhealthy lifestyles and unsustainable travel behaviour”.

An effective implementation of this strategy will require a fundamental shift in behaviour that will only be successful with major investment in alternative means of transport: alternatives that have to be available at both the journey starting point and the destination. With the VALP including promises such as *“A dualled Southern Link Road between A413 Wendover Road and A41 Aston Clinton Road and a strategic link road between the Southern Link Road and Marroway”* that seems a long way off, notwithstanding the pressures outlined above across the region.

Finally it is worth noting the following paragraph from the VALP:

“1.11 Comparing the land available for development in each district’s plan area against the forecast need for development shows that the capacity for development in areas south of Aylesbury Vale does not match the need for development. This is primarily because of the constraint of the Green Belt and an Area of Outstanding Natural Beauty (AONB)”.

This consideration led to the VALP Proposed Submission including 2,250 homes to meet the needs of Wycombe District and 5,750 homes to meet the needs of Chiltern/South Bucks Districts. Whilst it is recognised that these are districts within Buckinghamshire, Tring is as constrained, if not more so, by Green Belt and an Area of Outstanding Natural Beauty (AONB).

It is interesting to note how little Tring has grown relatively in the recent past despite the demand for housing and the lucrative returns available to house builders because of the highly constrained geography of Tring, surrounded as it is by the Chilterns A.O.N.B. and Green Belt. The lack of available land manifests itself through the increasing use of employment land for residential development, threatening the sustainable basis of the town.

There is little evidence within the Issues & Options Consultation that a connection has been made between new housing and job creation.

'Planning Practice Guidance 22 Housing and economic needs assessments' states "Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area. Any cross-boundary migration assumptions, particularly where one area decides to assume a lower internal migration figure than the housing market area figures suggest, will need to be agreed with the other relevant local planning authority under the duty to cooperate".

The defined South West Hertfordshire Functional Economic Market Area (FEMA) of Dacorum, Hertsmere, St Albans, Three Rivers and Watford provides an immediate geographic grouping that has its purposes, but this is too restricted in light of the scale of growth across the region.

Whilst the South West Herts FEMA may reflect existing travel to work and migration, we have already seen Hertfordshire County Council in its draft Local Transport Plan challenge the assumption that this can be sustained in the future. The scale of population growth similarly questions the validity of an assumption that perpetuates the current situation.

Which question are you responding to? (see list of questions below)

Question number	Q3 Have we taken account of all relevant studies and reports as part of our Issues and Options work?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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Comments

As a Transition Town, Tring supports the objectives of strengthen the local economy, reduce our environmental impact, and build our resilience for a future with less cheap energy and a changing climate. This is not to say ‘no growth’, but to have a strategy for growth.

The evidence base appears deficient with regard to taking a positive stance towards the issue of climate change, which is reflected in the passive manner climate change is dealt with in the Single Local Plan and is assessed in the Sustainability Appraisal e.g. Para 4.3 Growth Options Table 2.

In presenting the options and distributions the potential ramifications of the various levels of residential development are not spelt out, neither is reassurance given that policies necessary, not just to mitigate the impact, but to improve the situation for local communities will be put in place.

It is recognised that aspects of addressing climate change are more appropriate to the next level of planning, but there should be a central theme at this, the strategic level, that gives a clear commitment to the requirements of ‘Planning Practice Guidance 6 Climate Change’ set out below*.

Examples of documents to include in the evidence base are: “How Local Authorities Can Reduce Emissions and Manage Climate Risk” by Committee on Climate Change May 2012 and BEIS Clean Growth Strategy Oct 2017.

*“...effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so, local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. Planning can also help increase resilience to climate change impact through the location, mix and design of development.

...To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change...

... there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts ... The National Planning Policy Framework emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.

... Examples of mitigating climate change by reducing emissions:

- Reducing the need to travel and providing for sustainable transport
- Providing opportunities for renewable and low carbon energy technologies
- Providing opportunities for decentralised energy and heating
- Promoting low carbon design approaches to reduce energy consumption in buildings, such as passive solar design

Which question are you responding to? (see list of questions below)

Question number

Q4 Do you agree with the suggested vision for the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

The aspirations listed in the vision are all appropriate but as presented the vision lacks:

- Focus on the people of Dacorum
- A succinct expression of the plan's over-arching ambition
- Clarity – it is an unstructured collection of aims and implementation e.g. references to Maylands

"To make Dacorum a place to enjoy and to be proud of whether you are a resident, worker or visitor. Proud because:

- Local communities are inclusive and supportive
- Communities actively contribute to a healthier environment and lessening climate change
- The countryside is respected and well managed
- Services are accessible to all those that are in need
- Enterprise is encouraged and supported

Which question are you responding to? (see list of questions below)

Question number	Q5 Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovington, or the wider countryside?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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Comments

Because of its geography, Tring has a strong sense of identity and a strong sense of community. Perpetuating that sense of community is the Town’s priority. To achieve this the Town Council has identified five guiding principles to assess any plan for growth:

- Integration with the existing community
- Retention of Tring’s market town character
- Protection of the countryside
- The provision of, and access to, infrastructure
- That any growth is on a sustainable basis

The summary of Tring in the Core Strategy’s ‘Tring Place Strategy’ is succinct and generally still applicable, but the statement* concerning the High Street and local employment is losing credibility.

Many of the independent shops in the High Street have closed recently and are being replaced by service outlets. This is a typical pattern in Market Towns. Tring’s circumstances are not helped by the major supermarket being on the edge of town. On 19th June 2018 the Town’s last bank will close.

Local employment is being lost as landlords exploit the change in planning legislation giving them permitted rights to change to residential use.

This threatens the local economy and, therefore, puts the sense of community at risk.

The vision** for Tring in the Core Strategy is retrospective and needs to be changed to one that is forward looking.

To remain successful:

- Local facilities have to be protected, increased to match changing needs e.g. from an ageing population, and delivered in a format that is accessible
- Business activity that reflects local needs and skill sets must be encouraged
- The vibrancy of the Town centre must be protected by boosting tourism and achieving a balance of functions and offerings in the Town that attract visitors during the day, evening and at night***
- Any new housing should promote a balanced community particularly through the provision of truly affordable housing and of the highest possible environmental standards
- Sport and leisure facilities must be increased to match the growth in demand
- Provide effective alternatives to car transport through footpaths, cycle ways and public transport
- We must continue to protect Tring’s heritage and countryside

Continued

* Tring Place Strategy

“The town centre has a strong individual character with many shops and small businesses along the High Street and alleyways including a range of banks, restaurants, cafes, pubs, some specialist shops and a market place. The Zoological Museum and Tring Market Auctions are situated close to the town centre. There are also a variety of employment areas, the largest being Icknield Way Industrial Estate”

** The Vision

Tring remains a successful compact market town surrounded by farmland and delivering a high quality of life and prosperity for its residents and business community. Its built and natural heritage has been retained and enhanced. Accessibility to services and facilities has been improved, whilst promoting sustainable forms of travel.

This has been achieved by delivering a greater range of high quality housing to suit long-term local needs that integrates with the character of the town. Small-scale business activity is encouraged and advantage taken of tourist attractions, such as the Zoological Museum, the town’s green hinterland and Tring Reservoirs. Additional social facilities have also been sought for the young and elderly, with improved outdoor leisure facilities.

*** The Grimsey Review An Alternative Future For the High Street Conclusion 1:

“Town centre/high street plans must encompass a complete community hub solution incorporating health, housing, education, arts, entertainment, business/office space, manufacturing and leisure, whilst developing day time, evening time and night time cultures where shops are just part of the solution”

Which question are you responding to? (see list of questions below)

Question number

Q6 Do you agree with the suggested objectives for the new Local Plan?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

4.2.3. Sustainable Development

- *To promote the towns of Hemel Hempstead, Berkhamsted and Tring as the focus for homes, jobs and strategic services*

Inclusion of the word 'homes' pre-judges the consultation on the distribution of new housing. As already stated Tring is reaching its natural capacity and can only absorb a modest increase in housing.

The single bulletpoint should be replaced with two:

- Hemel Hempstead retains its pre-eminent position as the Borough's major population centre and centre for jobs and strategic services
- To maintain the historic role of Berkhamsted and Tring as market towns serving their surrounding villages as centres of employment and strategic services

Which question are you responding to? (see list of questions below)

Question number

Q7 Do you agree with the proposed policy coverage of the Local Plan?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes



No

Comments

Which question are you responding to? (see list of questions below)

Question number	Q8 Do you agree with the proposed broad approach to distributing new development?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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Comments

The broad principles are accepted, but with a significant caveat that there is a finite capacity in each settlement. This is embedded in Policy CS1:

“The market towns and large villages will accommodate new development for housing, employment and other uses, provided it:

- a) is of a scale commensurate with the size of the settlement and the range of local services and facilities;*
- b) helps maintain the vitality and viability of the settlement and the surrounding countryside;*
- c) causes no damage to the existing character of the settlement or its adjoining countryside; and*
- d) is compatible with policies protecting the Green Belt and Rural Area”.*

Given the scale of some of the growth under consideration, the option of new, separate communities should be given consideration as an alternative to absorbing all the growth in existing settlements. This is not to say that there are suitable sites, but there needs to be clear evidence that the option has been explored.

Given the scale of development within Dacorum, across Herts and in the neighbouring counties there is the need for a strategic overview, which may make this option more attractive – see Q37.

Which question are you responding to? (see list of questions below)

Question number	Q9 Do you agree with the proposed approach to Green Belt and Major Developed Sites summarised above?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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Comments

There is confusion on the Government’s position with regard to the Green Belt and what constitutes ‘exceptional circumstances’. A recent statement said no houses would be built on Green Belt

Paragraph 5.2.4 in the Issues & Options Local Plan implies that failure to meet one of the Government’s criteria* is sufficient to remove the land in question from the Green Belt.

This is unacceptable as the contribution made under certain criteria could be exceptional e.g. to preserve the setting and special character of historic towns whilst weak in another. Clarity should be given to what justifies removal of Green Belt status before considering locations.

Paragraph 5.2.6 as worded appears to relegate the status of Green Belt land is assessing the suitability of a location for development. A site should have to fail a threshold test in terms of its contribution as Green Belt before these further considerations come into play.

For example the Stage 2 Green Belt Review recommendations for sites Tr-h1 and Tr-h6 be retained as Green Belt.

* *The National Planning Policy Framework:*

“80. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;*
- to prevent neighbouring towns merging into one another;*
- to assist in safeguarding the countryside from encroachment;*
- to preserve the setting and special character of historic towns; and*
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”*

Which question are you responding to? (see list of questions below)

Question number

Q10 Do you agree with the proposed approach to the Rural Area summarised above?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓, but

Comments

The proposed approach should not preclude consideration of a new 'village' option to meet the housing need, particularly if the level of housing imposed upon the Borough be such that it cannot realistically be met within the existing settlement hierarchy.

Which question are you responding to? (see list of questions below)

Question number	Q11 Do you agree with the proposed approach to selecting sites?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓	No	
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Comments

There is concern that the process of identifying sites is skewed towards the most aggressive developers who are purely profit motivated. Effort should be made to secure sites which would be most beneficial to the settlement/surrounding area in light of the various strategies and visions – sites which have not been forthcoming during the 'call-for-sites' exercise.

Paraphrasing: have a vision and look for the sites to fulfil it; not make the best of what you get.

Which question are you responding to? (see list of questions below)

Question number

Q12 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?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

The section covers the majority of key issues relating to roads, transport and accessibility but paragraph 5.5.2 should include a commitment to improve air quality and to mitigate climate change.

A commitment from Dacorum to adopt Hertfordshire County Council's new emphasis in the draft Local Transport Plan on providing viable alternatives to car transport should be included. Such provision should then be a necessary condition for planning approval.

The review of parking standards is welcomed. These are woefully inadequate and will remain so until the provision of alternative means of transport bring about a change in behaviour.

Which question are you responding to? (see list of questions below)

Question number	Q13 Do you agree with the approach proposed to ensuring good quality design within Dacorum?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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Comments

There is a danger with the proposed approach as stated that the opportunity to promote standards above the minimum necessary to comply with legislation will be missed.

The principles of good design listed should be extended to include energy efficiency, ecologically friendliness, and minimising the environmental impact.

Which question are you responding to? (see list of questions below)

Question number

Q14 Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix a)

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

1. Clarify the coverage of 'Affordable Housing' by adding "and Starter Homes" currently excluded from the accepted definition of affordable housing.
2. Add to the 'Housing and Community Facilities' list a policy covering the quality of house design to promote design that is environmentally friendly e.g. energy efficient, provision of car chargers (or at least the necessary capacity electric outlets for fast chargers) and mitigate ecological damage e.g. swift boxes. Reliance on Government standards will mean only minimum standards are met. This may supplement 'Sustainable Design and Construction'.
3. Move 'Carbon Emission Reductions' to the 'Sustainable Development' list to place it centrally in the determination of sustainable development rather than amongst 'countryside' policies

Which question are you responding to? (see list of questions below)

Question number

Q15 Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market Assessment?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

✓

No

Comments

For Dacorum as a whole with the caveat that Tring, itself, is subject to forces outside the defined area.

Which question are you responding to? (see list of questions below)

Question number	<p>Q16 Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p>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)</p>
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	✓
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Comments

The locally assessed housing need figure (756) fails to take into account the constrained nature of land availability in Dacorum because of Green Belt and A.O.N.B.

A figure should be derived that reflects the ability of the Borough to deliver the housing growth and the necessary infrastructure (“organic growth”). Whilst respecting the Government’s policy to provide a major boost to the housing market, a blanket imposition of a target without consideration of local circumstances is irresponsible.

As an example of the alternative basis suggested, the following calculation is based upon the assumption that the maximum number of houses that each group in the settlement hierarchy can take sustainably is the minimum figure quoted in option 1:

- 1,750 Hemel Hempstead Option 1A
- 1,200 Berkhamsted & Tring Option 1A
- 850 Bovingdon, Kings Langley & Markyate Option 1C
- 3,800 Total or 640 dwellings pa.

The assumption is probably weakest in relation to Hemel Hempstead, which probably have a greater capacity to absorb housing. Taking the 2,980 figure quoted in option 1b the total contribution increases to 5,030 or 694 dwellings per annum.

Closer engagement with local communities at the beginning of the planning process would enable a realistic assessment of the potential contribution each settlement can make.

Which question are you responding to? (see list of questions below)

Question number	Q17 Do you agree with the proposed approach to affordable housing?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓	No	
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Comments

The Town Council welcomes the emphasis being placed on the provision of affordable housing. There is a desperate need for housing that is within the reach of young families. The Town Council is hopeful that it will shortly be able to make a small contribution to increasing provision in locally.

There is concern that a blanket application of the proportions suggested in paragraph 6.3.8 across the Borough should be avoided as this would not reflect local need.

Further work needs to be done to ensure that when considering specific developments the affordable housing schemes put forward are appropriate to the local area. The priorities in provision are social rented and shared-ownership schemes.

Consideration should also be given to 'starter homes' when opportunities present themselves.

Which question are you responding to? (see list of questions below)

Question number	Q18 Do you agree with the proposed approach to planning for specific types of housing?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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Comments

Paragraph 6.3.19 The existing strategy CS22 with regard to the provision of Gypsy & Traveller sites in the Core Strategy is too simplistic. There is no attempt to match the supply of pitches to where the demand is. That standalone sites are difficult to secure does not mean that this is the right policy to follow. The existing policy should not be carried forward.

Which question are you responding to? (see list of questions below)

Question number

Q19 Do you agree with the proposed suggested approach to the timing of site delivery?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

✓

No

Comments

The important factor is securing and delivering the necessary infrastructure in a timely fashion as development takes place. In Tring the provision of employment land should precede the new dwellings.

Local input should be sought before determining the phasing.

Which question are you responding to? (see list of questions below)

Question number

Q20 Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

✓

No

Comments

There is a clear logic to the approach running along a radial transport corridor from London. There is concern on the impact that the scale of growth at a regional level – AVDC, Central Beds, and the proposed Oxford/Cambridge arc – will have in this area of Hertfordshire.

Which question are you responding to? (see list of questions below)

Question number

Q21 Do you agree with the proposed approach to meeting future jobs growth?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

The conclusion of Regeneris's report 'South West Hertfordshire Economic Study' begins with a section entitled "An area with high growth potential" and the summary states:

9.42 The Economy Study has considered a number of scenarios for the future growth of South West Herts. All of these point to a high level of growth which is above the national average. This reflects the strong economic performance of South West Herts, which has been driven by its transport connections, access to London and highly skilled labour market.

The source of growth is "a significant increase in demand for office space". Whilst it is recognised that Dacorum is not starting from the best base, its transport links, location, new methods of working, local further education providers and lower costs relative to London can present an attractive package.

Section 7.2 Issue 13 appears to pay lip service to these opportunities for commercial growth and opt for an easy option of providing warehouse space (for which there is a demand) but this will only create a relatively low number of poorly paid jobs whilst being 'land hungry'

In the rush for houses, commercial provision is being neglected and this is not helped by the 'prior approval' process. Opportunities for smaller business parks should be sought as well as large site—the extension to the Icknield Way Industrial Estate in LA5 is an example and Tr-h5 Dunsley Farm, both close to the A41 with rail transport also available.

The take-up of units in the Maylands Business Centre demonstrates what can be achieved.

Which question are you responding to? (see list of questions below)

Question number	Q22 Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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Comments

In a sense, at the macro level, there is no disagreement with the proposed approach to accommodate future jobs, but the proposed emphasis on industrial and, in particular warehousing, is wrong (See Q21 above).

More sustainable growth would be achieved at Dunsley Farm through commercial and light industrial/high tech businesses. This would also be more appropriate to the town gateway site.

Tring School, the second largest secondary school in Hertfordshire, received a good rating in its most recent Ofsted inspecting, with an outstanding rating for 16 to 19 study programmes; it is an excellent source of local skills.

Which question are you responding to? (see list of questions below)

Question number

Q23 Do you agree with proposed approach to meeting future retail needs?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

In terms of major sites the approach is appropriate, but misdirected. Rather than looking at the square meterage, the focus should be on generating economic vibrancy in the Borough's High Streets.

The ethos as articulated in 'The Grimsey Review An Alternative Future For the High Street Conclusion 1' should be adopted:

"Town centre/high street plans must encompass a complete community hub solution incorporating health, housing, education, arts, entertainment, business/office space, manufacturing and leisure, whilst developing day time, evening time and night time cultures where shops are just part of the solution"

Which question are you responding to? (see list of questions below)

Question number	Q24 Do you agree the proposed approach to encouraging tourism?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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Comments

Tourism should play a significant part in the Single Local Plan and be resourced accordingly. It is also important to emphasize that the target market begins with local residents.

An illustration ... 25,000 people visit Tring Natural History Museum in August. In itself this is educational, but getting the visitors to explore Tring and/or visit the High Street will improve health and boost the local economy too.

Which question are you responding to? (see list of questions below)

Question number

Q25 Do you support the proposed approach to the natural environment?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

✓

No

Comments

It is important to bear in mind the importance of the land adjacent to the Chilterns A.O.N.B. (the setting of the A.O.N.B.) because of the impact development would have on views into and out of the A.O.N.B.

Ecological corridors within towns also make a valuable contribution to wildlife habitat and the well-being of residents.

Which question are you responding to? (see list of questions below)

Question number

Q26 Do you support the proposed approach to the historic environment?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes



No

Comments

Which question are you responding to? (see list of questions below)

Question number

Q28 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?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	<input checked="" type="checkbox"/>	No	
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Comments

Whilst recognising the constraints imposed by Government, this area appears to condemn the Borough to development that meets minimum standards when there is an opportunity to make a positive environmental contribution that would benefit all.

Which question are you responding to? (see list of questions below)

Question number

Q29 Do you agree that we have covered all relevant issues relating to physical infrastructure?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

Tring has a deficit in all three aspects of infrastructure faced with the existing growth of 500 dwellings.

Assurance is required that the necessary infrastructure to support the growth and achieve the goals of the Single Local Plan will be financed and provided. The Issues and Options Local Plan appears to follow an approach in determining infrastructure provision that is based on site size not the cumulative impact of all development upon a settlement. Not taking a holistic view puts at risk the provision of the necessary infrastructure for sustainable development to be achieved.

There is concern that measures that could be part of the planning process – to reduce water usage and loss, to reduce car transport by improving the facilities for cycling and walking, and incorporating community energy schemes – are being excluded by Government policy or a lack of local ambition within the Single Local Plan to provide such alternatives that would reduce infrastructure needs.

Whilst transport is the prime responsibility of Hertfordshire County Council, no reference is made to improving the rail link between Dacorum and London and embodying improved access to railway stations within the planning process.

The provision of internet/broadband (or the most up to date technology equivalent) should also be considered as part of the necessary infrastructure.

Which question are you responding to? (see list of questions below)

Question number

Q30 Do you think that we have covered all relevant issues relating to social infrastructure?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

Tring has a deficit in all three aspects of infrastructure faced with the existing growth of 500 dwellings.

Assurance is required that the necessary infrastructure to support the growth and achieve the goals of the Single Local Plan will be financed and provided. The Issues and Options Local Plan appears to follow an approach in determining infrastructure provision that is based on site size not the cumulative impact of all development upon a settlement. Not taking a holistic view puts the provision of the necessary infrastructure for sustainable development to be achieved at risk.

There is concern that any provision made is accessible. Public sector bodies looking to save money have a tendency to amalgamate and centralise e.g. closure of the Tring Clinic and Gossoms End despite 'initiatives' promising local delivery, making access difficult especially for the more vulnerable members of the community.

There is concern that, pending the determination of the ultimate level of growth, there needs of be an increase in the capacity of the local hospitals. Tring residents currently use Stoke Mandeville and Luton & Dunstable hospitals – both outside the county – as well as Watford.

Providing the necessary secondary school places is of particular concern even allowing for the recently announced creation of a multi-academy trust and a major refurbishment.

Which question are you responding to? (see list of questions below)

Question number	Q31 Do you think that we have covered all issues relating to green infrastructure?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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Comments

Tring is surrounded by the Chilterns A.O.N.B. and any open land between the settlement boundary and the A.O.N.B. (all Green Belt) is part of the setting of the A.O.N.B. This is an intrinsic factor in the character and community of Tring. Its protection is vital.

As worded paragraph 9.3.4 is an open-ended statement allowing fundamental changes of policy after the consultation. Updating evidence and determining policy in light of the most recent information is laudable, but must only be adopted after through scrutiny and before submission of the Plan.

Which question are you responding to? (see list of questions below)

Question number

Q32 Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

✓

No

Comments

Which question are you responding to? (see list of questions below)

Question number

Q33 Do you agree that the three growth levels proposed are the most reasonable to consider?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

In light of the Government's white paper 'Planning for the right homes in the right places' Options 1 and 3 appear logical. Whilst recognising the pressure being faced by the Planning Team, the options being considered should have reflected more closely the levels of growth that can be achieved sustainably (See Q16).

Option 2 follows what one could call the accepted norm in terms of the procedural steps to take when deriving a figure. What is questionable is whether due consideration has been given to the Borough's ability to absorb the quoted figure because of the amount of land with Green Belt status and the Chilterns A.O.N.B.

That AVDC is taking allocations from High Wycombe and Chiltern District Councils because of similar constraints is germane. There is no evidence that Dacorum has actively explored the potential of exporting a large proportion of the calculated growth to other less constrained areas of Hertfordshire or other authorities.

Such discussions should have taken place before the Issues and Options consultation. There should also be clarity on the possible inclusion of the Crown Estate development adjacent to Hemel Hempstead within St Alban's.

That the Issues & Options consultation is being conducted without including what could be the most realistic housing option calls into question the validity of the exercise. Consequently these are not the most reasonable options to consider.

Which question are you responding to? (see list of questions below)

Question number	<p>Q34 Do you agree with the rejection of the following growth levels:</p> <p>a) Continuing the current housing target (430 homes / year);</p> <p>b) ‘Urban Capacity’ option (476 homes year); and</p> <p>c) Significantly above the upper Government figure (1,100+ homes / year).</p>
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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Comments

The ‘Urban Capacity’ option

- The Brownfield Register will not be published until 2018. Current data was collated from the existing data sources of Dacorum’s Strategic Housing Land Availability Assessment (SHLAA), existing planning permissions and pending planning decisions. Once the results of the call-for-sites in are and the new register is published the figures used are in question
- That a deficit relative to housing need can be considered an ‘exceptional circumstance’ is in doubt given recent Government statements
- A clear and accepted policy on when it can be deemed that Green Belt does not meet the Government’s tests for such a designation is needed

With an answer to the points above one will have a realistic option available for consideration.

Which question are you responding to? (see list of questions below)

Question number

Q35 Has the Council considered all reasonable alternative levels of growth?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No



Comments

See the response to Q33 & Q34 above

Which question are you responding to? (see list of questions below)

Question number

Q36 Do you support the proposed locational principles?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

This is effectively a duplication of Policy CS1 Distribution of Development. There should be clarity on the precedence of Policy CS1 over the Location Principles.

Which question are you responding to? (see list of questions below)

Question number	Q37 Do you agree with the rejection of the following growth distributions: a) New settlement (town or village); b) Rural growth; c) Export growth to another Council area; d) Use greenfield land before brownfield land; and e) Significant expansion of a large village(s)
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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Comments

Option (c) should be explored because of the constraints the Green Belt and Chilterns A.O.N.B. places on Dacorum's ability to take further growth.

With regard to the option of a new settlement, the suggestion that this is looked at on a county basis is noted. This could be linked with the announcements of development of the Oxford/Milton Keynes/Cambridge arc with development within the Royston–Baldock–Buntingford triangle. The area north of Tring mentioned is already surrounded by development in Aylesbury and Leighton Buzzard which will put the poor communication links under even greater pressure.

Which question are you responding to? (see list of questions below)

Question number

Q38 Has the Council considered all reasonable alternatives for distributing growth?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

✓

No

Comments

In principle these have been covered, but the ability to use the alternatives as stated is, at best, not proven.

Which question are you responding to? (see list of questions below)

Question number

Q39 Is Option 1A your preferred option for delivering the growth needs of the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

✓

No

Comments

The capacity of Dacorum to accommodate new growth is a function of Hemel Hempstead's capacity.

The extent of protected land – Green Belt and the Chilterns A.O.N.B. – and the application of Policy CS1 preclude anything beyond a modest contribution from the market towns, larger villages and rural areas. The existing allocations under the Site Allocations document effectively take up that capacity already.

As the lowest level of housing provision included in the options in the consultation, this is the most likely to be achievable on a sustainable basis. The ability to absorb higher levels of housing growth is dependent upon them being taken by Hemel Hempstead.

In accepting an allocation, Tring sees this as part of a mixed development on site Tr-h5 Dunsley Farm that would address the Town's existing priorities arising from the Core Strategy's additional 500 houses in Tring:

- Employment land and more sports/leisure facilities
- Social rented housing, and affordable shared-ownership schemes
- Minimal impact on the countryside

Which question are you responding to? (see list of questions below)

Question number

Q40 Is Option 1B your preferred option for delivering the growth needs of the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

Whilst this option would clearly be welcomed as there is no further housing growth allocated to Tring, it is felt that Option 1A has the potential to give necessary infrastructure which would not be forthcoming under this option.

Which question are you responding to? (see list of questions below)

Question number

Q41 Is Option 1C your preferred option for delivering the growth needs of the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

See the response to Q40.

The interpretation of this distribution "More evenly spread across the Borough" (which is not actually given in the Issues & Options document due to a printing error) as evidenced by the allocation is actually "No increase in Hemel Hempstead".

Bovingdon, Kings Langley and Markyate contribute 850 houses, whilst Berkhamsted and Tring contribute an additional 875 and Hemel Hempstead's contribution drops to zero. Given the existing infrastructure in Hemel Hempstead this is perverse.

Which question are you responding to? (see list of questions below)

Question number

Q42 Is Option 2A your preferred option for delivering the growth needs of the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No



Comments

See the response to Q40. The level of housing need in Option 2 exceeds the capacity of Hemel Hempstead and, therefore Dacorum, to absorb the proposed growth.

Which question are you responding to? (see list of questions below)

Question number

Q43 Is Option 2B your preferred option for delivering the growth needs of the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No



Comments

See the response to Q40. The level of housing need in Option 2 exceeds the capacity of Hemel Hempstead and, therefore Dacorum, to absorb the proposed growth.

Which question are you responding to? (see list of questions below)

Question number

Q44 Is Option 2C your preferred option for delivering the growth needs of the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

See the response to Q40. The level of housing need in Option 2 exceeds the capacity of Hemel Hempstead and, therefore Dacorum, to absorb the proposed growth.

Which question are you responding to? (see list of questions below)

Question number

Q45 Is Option 3 your preferred option for delivering the growth needs of the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes

No

✓

Comments

The calculation used, as proposed in the Government's consultation, is unproven and therefore an inappropriate basis upon which to judge housing need.

Applying the formula results in a figure of 1,100 houses p.a. This is 2.55 times the Core Strategy rate. To achieve this figure would do irreparable damage to the countryside and to be sustainable would require a level of infrastructure investment that is unaffordable and non-deliverable.

Which question are you responding to? (see list of questions below)

Question number	Q46 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?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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Comments