

# Sustainability Appraisal (SA) of the Dacorum Local Plan

Interim SA Report

October 2023

**Quality information:**

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# 1 Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Dacorum Local Plan ("the Plan"), which is being prepared by Dacorum Borough Council (DBC).
- 1.1.2 Once adopted, the Plan will set the strategy for growth and change for the Borough up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.<sup>1</sup>

## 1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of "the plan and reasonable alternatives". The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:<sup>2</sup>
  - What has Plan-making / SA involved up to this point?
    - including appraisal of 'reasonable alternatives'
  - What are the SA findings at this stage?
    - i.e. in relation to the draft plan
  - What are next steps?

## 1.3 This Interim SA Report

- 1.3.1 The Council is currently consulting on a 'Revised Strategy' for Growth under Regulation 18 of the Local Planning Regulations. This is a follow-on to the 'Emerging Strategy for Growth' consultation held in late 2020/early 2021. Importantly, the current consultation is focused only on strategy and sites (not policies).
- 1.3.2 The aim of this Interim SA Report is to inform the current consultation and subsequent preparation of the final draft ('proposed submission') version of the plan. See further discussion of 'next steps' below.

### Structure of this report

- 1.3.3 Despite this being an 'Interim' SA Report, as opposed to the formally required SA Report, it is nonetheless helpful to structure this report according to the **three questions** above. Each of the three questions is answered within a discrete 'part' of the report. Before answering the first question there is a need to further set the scene by setting out the scope of the plan (Section 2) and the scope of the SA (Section 3).

### Commenting on this report

- 1.3.4 This report can be referenced as part of comments on the revised strategy and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under 'next steps'.

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<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

<sup>2</sup> See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

## 2 The plan scope

### 2.1 Introduction

- 2.1.1 The aim here is to briefly introduce the: context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the ‘plan scope’).

### 2.2 Context to plan preparation

- 2.2.1 DBC began preparing a new Local Plan in **2017**, with an ‘Issues and Options’ consultation under Regulation 18 of the Local Planning Regulations. The Emerging Strategy for Growth (or simply ‘Draft Plan’) was then published for consultation in **2020**. This generated quite a high degree of interest, with over 16,000 comments received from over 4,000 people (N.B. the Borough’s population is ~155,000).
- 2.2.2 Central to any local plan is identifying a ‘supply’ of land to meet development needs over the course of the plan period. Paragraph 11 of the National Planning Policy Framework (**NPPF**) is clear that local authorities should maintain an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development. There is a requirement to review local plans every five years, and a local plan can also be deemed out-of-date where the rate of supply in practice falls significantly below that which the local authority has committed to deliver within the adopted plan.
- 2.2.3 The current Dacorum Local Plan (**the Core Strategy**) was adopted in 2013, and so its policies in relation to housing supply are out-of-date. That being the case, the objectively assessed need for housing locally is taken to be 1,018 dwellings per annum (dpa) when determining planning applications, in line with the Government’s ‘standard method’ for calculating objectively assessed need, which is also referred to as Local Housing Need (LHN). This is in contrast to the housing requirement of 430 dpa in the Core Strategy. As measured against the 1,018 homes figure, the Borough has an existing supply of ‘deliverable’ housing sites sufficient to meet needs for 2.19 years. The NPPF requires a ‘five year housing land supply’ (5YHLS) of deliverable sites, with the presumption in favour of sustainable development (or the ‘tilted balance’) applying where there is not a 5YHLS.<sup>3</sup> Where this applies there is reduced potential to defend against planning applications. The Council may reject an application only for it to then be allowed at appeal, because the appointed Inspector has applied the presumption / tilted balance (known as ‘planning by appeal’, which can also be costly and time-consuming for councils).
- 2.2.4 The above discussion introduces the ‘**stick**’ that is in place to encourage the speedy adoption of a new Local Plan for Dacorum. However, it is also important to state that there are many ‘**carrots**’. Focusing on housing, meeting needs is clearly of great importance in-and-of itself, but also gives rise to wide-ranging secondary benefits, for example in terms of health and well-being and supporting the economy. Also, plan-led housing growth creates an opportunity to strategically target investment in regeneration and infrastructure (including transport, community and green infrastructure). This can serve to maximise the benefits of growth, potentially delivering ‘planning gain’ to the local area. Growth related opportunities can and do go missed when new homes come forward in the absence of an up-to-date local plan.
- 2.2.5 Finally, by way of context, it is important to acknowledge that Dacorum Borough is not an island, but rather functions as part of a wider sub-region. Dacorum functions particularly strongly within a South West Hertfordshire sub-region, but there are also other geographies to consider. Under the Localism Act (2011) there is a **Duty to Cooperate** placed on local authorities that must be exercised when preparing local plans. Sharing housing needs across a sub-region is often a key issue for cooperation, but there are also wide-ranging other issues, for example around strategic transport infrastructure and the environment (e.g. the water environment). In the Dacorum context, one key ‘larger than local’ issue is planning for Hemel Garden Communities ([HGC](#)) in collaboration with St Albans District, noting the proposals in the St Albans Draft Local Plan (2023). Returning to housing needs, the following is a clear statement within the Draft NPPF published for consultation in December 2022 (which remains in draft at the time of writing):

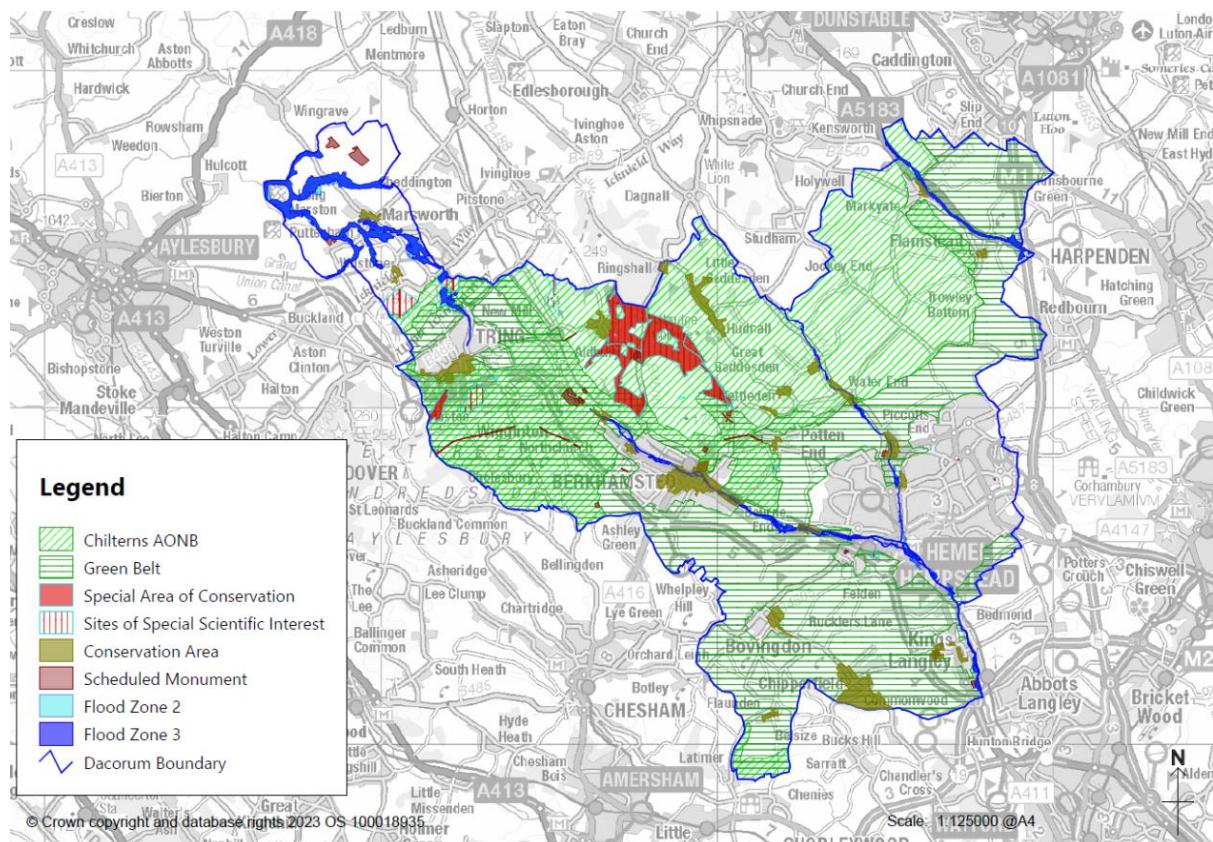
*“The [housing] requirement may be higher than identified housing need if it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure...”*

<sup>3</sup> As well needing to maintain a 5YHLS, housing supply performance is also evaluated using the Housing Delivery Test (HDT).

## 2.3 The plan area

- 2.3.1 Dacorum Borough is located in South West Hertfordshire, bordering Buckinghamshire and Bedfordshire. Figure 2.1 serves to highlight a range of significant constraints to growth:
- Green Belt – the south of the Borough falls within the London Metropolitan **Green Belt**, such that there is a need to demonstrate ‘exceptional circumstances’ in order to justify release of land for development.
  - Chilterns Area of Outstanding Natural Beauty (**AONB**) – constrains the majority of the Borough beyond the Green Belt, and the AONB setting is also a factor. An AONB [boundary review](#) is underway.
  - Recreational pressure on the Ashridge Commons and Woods SSSI part of the **Chilterns Beechwoods** Special Area of Conservation (SAC) is a key constraint to growth, and one that is better understood now relative to at the time of the Draft Local Plan consultation. It is discussed further below, in Section 5.2.
  - Also shown on the figure are the **flood zones** of the Rivers Bulbourne, Gade and Ver. Whilst the flood zones are not extensive, these are valued and sensitive chalk streams, and their valleys through the chalk downland of the Chilterns are associated with steep topography and historic settlement.
  - The figure also shows **conservation areas**, which are an important constraint to growth (alongside other historic environment designations), including from a transport perspective (e.g. traffic is an issue in the historic core of Berkhamsted, despite the A41 acting as a bypass). All higher order settlements have expanded well-beyond their historic cores, but this is most notably the case for Hemel Hempstead, which saw strategic expansion under a Government new towns programme in the mid-20<sup>th</sup> Century.
  - Finally, the north west extent of the District, **around Marsworth**, falls outside of the Green Belt and AONB, but there is little or no strategic case for directing growth to this area, including given transport links, flood risk, AONB setting, Tring Reservoirs and the Grand Union Canal (junction with two arms).
- 2.3.2 In light of these bullet points, it is clear that Dacorum is subject to constraint that “*provides a strong reason for restricting the overall scale, type or distribution of development*” in line with NPPF paragraph 11 and footnote 7. For example, it is important to note that all of the settlements within the top two tiers of the settlement hierarchy are constrained by Green Belt and/or the AONB (N.B. the small area of ‘white land’ at the western edge of Hemel Hempstead has planning permission for housing).

**Figure 2.1: Key constraints to growth affecting Dacorum Borough**



2.3.3 Other points for discussion on the basis of the figure above include:

- **Settlement pattern** – the settlement hierarchy is a focus of discussion below alongside wider discussion of how growth-related issues / opportunities vary across settlements. One point to note here is that Hemel Hempstead is both by far the largest settlement locally and also that which links most closely with neighbouring areas, particularly Watford and St Albans. It is also important to note that any expansion of Hemel Hempstead to the east would involve land in St Albans District (and the Green Belt).
- **Transport connectivity**– Hemel Hempstead is well-connected to the strategic road network; however, the train stations are at the western extent of the town, with an established need to improve accessibility. The A41 / A414 is a major orbital transport corridor (similar to the M25), linking Oxfordshire in the west to Essex in the east. The A41 through Dacorum was built in the early 1990s and functions well, acting as a bypass to Berkhamsted and Tring. The A414 east from Hemel Hempstead is priority for investment and enhancement (e.g. see information [here](#)), including with enhancements to M1 Junction 8. Finally, there is a need to note that the train line through Hemel Hempstead also serves Kings Langley, Berkhamsted and Tring, although the station at Tring is located ~1km to the east of the town.
- **Employment land** – a key point to highlight is the regional importance of Maylands Business Park, which forms a central component of [Herts IQ](#). A key aim of HGC is to ensure that opportunities for expansion are fully realised alongside necessary transport infrastructure improvements.
- **Socio-economic characteristics** – the Borough is overall quite affluent, but there are significant spatial disparities within Hemel Hempstead, in particular, associated significant relative deprivation (see mapped data [here](#)). There are well-established regeneration opportunities, which are discussed below. Outside of Hemel Hempstead there are also communities-related issues and opportunities that might be addressed via growth, and housing need is an issue Borough-wide. The ratio of local house prices to local wages has roughly doubled in 20 years, standing at 13.86 in 2022 (see data [here](#)).

## 2.4 The plan period

- 2.4.1 The Local Plan is likely to be adopted in 2025 and should cover a period of 15 years from plan adoption. Additionally, NPPF paragraph 22 states: “*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead, to take into account the likely timescale for delivery.*”
- 2.4.2 The plan period start date is 2024 as this is the date when, it is anticipated, the plan will be submitted to the Government for examination. As such, and on balance, the plan period is 2024 to 2040.
- 2.4.3 A significant amount of development already has planning permission or an existing allocation and will come forward in the early years of the plan period ('commitments'). As such, the role of the Local Plan is essentially to identify new supply, including via allocations (also potentially 'broad locations', as per NPPF para 68), to bolster the committed supply and, in turn, ensure a robust supply of development land ('supply trajectory') - as measured against need / the defined requirement (discussed below) - across the entire plan period as far as possible (mindful that NPPF para 68 allows for flexibility in respect of latter years).

## 2.5 Plan objectives

- 2.5.1 A set of objectives to guide plan-making was set out in the Draft Plan (2020). The objectives from 2020 can be seen [here](#) and have not been formally updated. They are considered to remain suitably up to date.
- 2.5.2 However, there is a need to consider the following objective from 2020: “*Deliver the identified housing requirement between 2020 and 2038.*” There are three points to make.
- Firstly, the plan period is now 2024 to 2040, as discussed above.
  - Secondly, the term 'identified housing requirement' is, on reflection, requires clarification. It would have been more appropriate to refer to 'objectively assessment housing need' or 'Local Housing Need (LHN)'.
  - Thirdly, as discussed above, a central requirement of the NPPF is to plan for LHN (by setting a housing requirement and identifying a supply of land sufficient to deliver on the requirement in practice) as far as is consistent with sustainable development. There is no strict (or 'mandatory') requirement to plan for LHN in full (i.e. set the housing requirement precisely at LHN). In short, there is a degree of flexibility.

# 3 The SA scope

## 3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. The aim is not to define the scope of the SA comprehensively, recognising that there is a need for flexibility to respond to the nature of the emerging plan and reasonable alternatives, and latest evidence.

## 3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA Report], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>4</sup> As such, these authorities were formally consulted on the SA scope in 2017.
- 3.2.2 Subsequently, the SA scope was presented in two SA notes and within the Interim SA Report published as part of the Draft Local Plan consultation (2020). No comments were received on the SA scope in 2020.
- 3.2.3 Comments on the SA scope are welcomed at the current time. It is important that the SA scope responds to the evolving scope of the plan and reasonable alternatives, and the latest evidence-base.

## 3.3 The SA framework

- 3.3.1 The primary outcome of scoping is a list of topics/objectives that can then be utilised as a ‘framework’ under which to structure appraisal work (i.e. appraisal of “the plan and reasonable alternatives”). The aim is to ensure that appraisal is well-targeted, concise and engaging. Table 3.1 presents the SA framework.
- 3.3.2 The SA scope at the current time reflects the following **adjustments** relative to the 2020 version:
  - Several objectives are expanded in order to give a flavour of specific issues and opportunities that might be explored through the appraisal. To reiterate, the aim is not to define the scope precisely.
  - ‘Accessibility’ is added as a new topic heading, replacing a previous topic heading dealing with ‘sustainable locations’. The aim is simply to add clarity, as opposed to a substantive change.
  - A previous topic dealing with ‘climate change’ is split into two topics – one dealing with mitigation / decarbonisation and the other adaptation / resilience. Under the latter topic heading it is appropriate to consider ‘flood risk’, albeit it is recognising that flood risk is an issue notwithstanding climate change.
  - ‘Employment and economy’ is presented as a topic heading in place of ‘sustainable prosperity’. This is with a view to clarity and also aims to respond to the plan scope / key issues for the plan (specifically, provision for employment land is a key issue locally, notably in respect of Maylands Business Park). Under this topic heading it is considered appropriate to consider ‘education and skills’, rather than considering this matter under a stand-alone topic heading (noting the new ‘accessibility’ topic heading).
  - ‘Transport’ is added as a new topic heading.
- 3.3.3 The net effect of adjustments made is that the SA framework comprises 15 topic headings at its core, which is *as per* the previous SA framework used as the basis for work in 2020.

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<sup>4</sup> In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*’

**Table 3.1:** The SA framework

Topic	Objective
Accessibility	Ensure good access to existing and planned community infrastructure, directing growth to 'sustainable locations'.
Air quality	Achieve good air quality, especially in urban areas.
Biodiversity	Protect, maintain and enhance biodiversity and geodiversity at all levels.
Climate change adaptation	Increase the resilience of the District to the potential effects of climate change, including increased flooding, droughts and heatwaves.
Climate change mitigation	Reduce per capita (i.e. per person) contribution to climate change, with a focus on both built environment and transport emissions.
Communities	Support high quality living environments and strong communities, including good relations fostered between people and groups. Improve community cohesion, social inclusion, reduced inequalities, social inclusion and reduced fear of crime.
Economy and employment	Grow a sustainable and inclusive economy, building upon strengths and opportunities and increasing long-term economic resilience. Ensure local residents have employment opportunities and access to training.
Health and wellbeing	Support health and wellbeing for all groups, reducing health inequalities and delivering positive outcomes, including through access to facilities, open space and green infrastructure.
Historic environment	Identify, conserve and enhance the historic environment and cultural heritage assets, including their setting, and also conserve / enhance historic character.
Homes	Ensure that everyone has access to good quality housing that meets their needs, providing for needs in full as far as possible. Increase access to high-quality housing of the right type and tenure, including affordable housing.
Land and soils	Make efficient use of land and protect soils. Ensure the efficient and effective use of land, including accounting for the grade of productive agricultural land.
Resources	Use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible.
Landscape	Conserve and enhance landscape and townscape character and encourage local distinctiveness. Protect and enhance the character and quality of the diverse landscapes at a range of scales, including agricultural landscapes, river valleys, settlement gaps and key green infrastructure assets/corridors.
Transport	Promote modal shift away from the private car and reduce the need to travel, whilst avoiding traffic congestion and associated issues.
Water	Protect, maintain and enhance the water environment and water resources (including water quality and quantity).

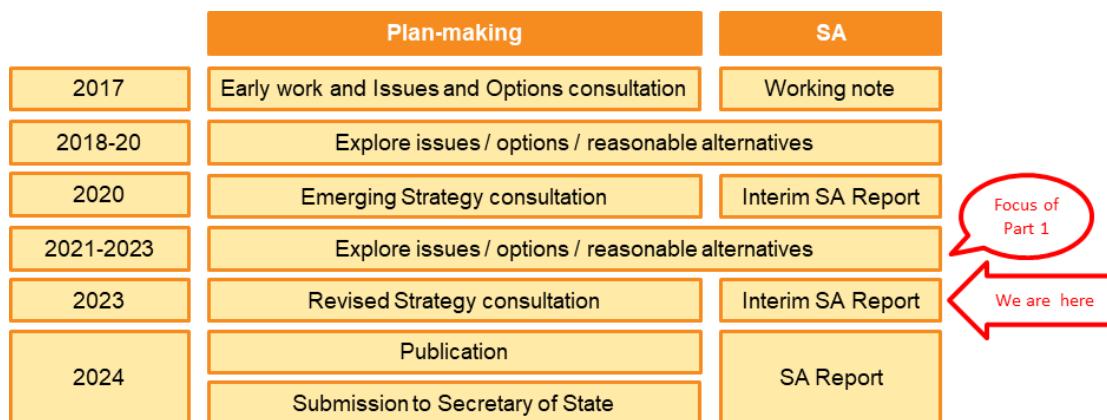
## **Part 1: What has plan-making / SA involved up to this stage?**

# 4 Introduction to Part 1

## Overview

- 4.1.1 Work on the new Local Plan began in 2017, immediately following adoption of the Site Allocations DPD. There have been two formal consultations to date, under Regulation 18 of the Local Planning Regulations, ahead of this current consultation (also under Regulation 18) – see Figure 4.1.

**Figure 4.1: Establishing reasonable growth scenarios**



- 4.1.2 The focus here, within Part 1, is not to relay the entire ‘story’ of the plan-making/SA process, nor to provide a comprehensive ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Section 5**
  - present an appraisal of the reasonable alternatives - see **Section 6**
  - explain the Council’s reasons for selecting the preferred option - see **Section 7**
- 4.1.3 Presenting this information is in accordance with the requirement for the SA Report to provide an appraisal of ‘reasonable alternatives’ and ‘an outline of the reasons for selecting the alternatives dealt with’.

## Reasonable alternatives in relation to what?

- 4.1.4 The legal requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*” (see Section 2). Following discussion of the plan objectives with DBC officers, it was determined appropriate to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly a key objective of the Local Plan.<sup>5</sup> As such, it was reasonable to focus on exploring alternatives (see Sections 5 and 6) so as to inform a final decision on the preferred spatial strategy (see Section 7) and to inform the current consultation.

- 4.1.5 The decision was made to refer to the spatial strategy alternatives as “**growth scenarios**”.

### What about site options?

- 4.1.6 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the Dacorum Local Plan. Rather, the objective is to allocate a **package** of sites to meet needs and wider objectives, hence RAs should be in the form of alternative **packages** of sites, as far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.

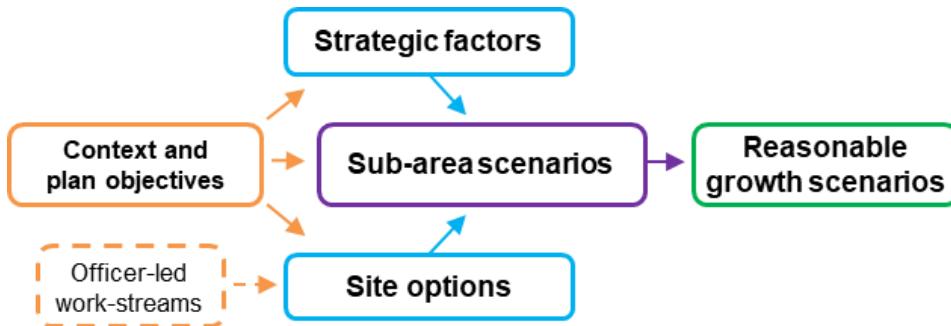
<sup>5</sup> It was also considered appropriate to focus on ‘spatial strategy’ given the potential to define “do something” alternatives that are meaningfully different, in that they will vary in respect of ‘significant effects’. The Government’s Planning Practice Guidance (PPG) is clear that SA “should only focus on what is needed to assess the likely significant effects of the plan”.

# 5 Defining growth scenarios

## 5.1 Introduction

- 5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios - see Figure 5.1 for an overview. To reiterate, growth scenarios equate to **reasonable alternatives**.

**Figure 5.1: Establishing reasonable growth scenarios**



### Structure of this section

- 5.1.2 This section explains a process to define reasonable growth scenarios as follows:
- **Section 5.2** – explores **strategic factors** (issues / opportunities / options) that are a ‘top down’ input.
  - **Section 5.3** – considers individual **site options** that are ‘bottom up’ input (or ‘building blocks’).
  - **Section 5.4** – explores growth options and scenarios for **sub-areas**.
  - **Section 5.5** – combines sub-area scenarios to form borough-wide **reasonable growth scenarios**.

### A note on limitations

- 5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an “**outline of the reasons for selecting alternatives...**” [emphasis added].

## 5.2 Strategic factors

### Introduction

- 5.2.1 The aim of this section of the report is to explore strategic issues, opportunities and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:
- Quantum – *how many* new homes are needed (regardless of capacity to provide them)?
  - Distribution – broadly *where* is more / less suited to growth and what *types* of growth are supported?

### Quantum

- 5.2.2 This section sets out the established Local Housing Need (LHN) figure for the Borough, before exploring *high-level* arguments for the Local Plan providing for a quantum of growth either above or below LHN.

#### Background

- 5.2.3 A central tenet of the plan-making process is the need to **A**) establish housing needs; and then **B**) develop a policy response to those needs. The Planning Practice Guidance (PPG) explains: “*Assessing housing need is the first step in the process of deciding how many homes need to be planned for...*”

- 5.2.4 With regards to (A), the NPPF (2021)<sup>6</sup> is clear that establishment of LHN should be informed by an “assessment conducted using the standard method... unless exceptional circumstances justify an alternative approach which also reflects... demographic trends and market signals”.
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting the housing **requirement** at LHN and identifying a **supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that *departs* from LHN.
- 5.2.6 Box 5.1 discusses the latest national context, in light of the Draft NPPF (2022).

**Box 5.1: A note on the national context in respect of LHN and setting the housing requirement**

As discussed, a central tenet of plan-making involves: A) establishing LHN; and then B) developing a policy response. This is explained particularly clearly within the PPG, but the NPPF (2021) also discusses the potential to set the housing requirement at a figure below LHN at paragraph 11, whilst paragraph 35 discusses the possibility of setting the housing requirement at a figure above LHN to reflect unmet need from elsewhere.

The Government consulted on proposed changes to the Draft NPPF between December 2022 and March 2023, but it is unclear when the NPPF will be fully updated (a partial update was made in [September 2023](#)). With regards to the matter of establishing LHN and setting a housing requirement, there are several points to note:

- Firstly, an addition to paragraph 61 states that understanding of LHN is an “*advisory starting-point for establishing a housing requirement for the area.*” This is considered to be simply a clarification.
- Secondly, an addition to paragraph 66 states that: “*The [housing] requirement may be higher than [LHN] if it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment.*” Again, this is considered to be simply a clarification of the existing situation.
- Thirdly, several proposed changes are potentially supportive of a ‘below LHN’ housing requirement:
  - Paragraph 11 – new additional text serves to suggest that avoiding adverse effects to urban character is a factor that might influence a decision to set the housing requirement below LHN.
  - Paragraph 140 – new statement: “*Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting [LHN].*” This arguably adds weight to Green Belt as a constraint. This was preceded by the following [statement](#) made by the Secretary of State for Levelling Up Homes and Communities on 5<sup>th</sup> December: “*Green Belt protections will be strengthened, with new guidance setting out that local authorities are not required to review Green Belt to deliver homes.*”
  - Paragraph 35 – amended to say local plans should “*meet the area’s [LHN] so far as possible, taking into account the policies in this Framework.*” Additionally, reference to providing for unmet needs is deleted. This is arguably supportive of a ‘below LHN’ housing requirement and/or not providing for unmet needs.

In **summary**, the Draft NPPF (2022) does appear to increase the potential to argue for lower growth, whether in the form of a housing requirement below LHN or that does not provide for unmet needs from elsewhere.

However, the significance of the proposed changes is not entirely clear and should not be overstated. Also, and in any case, the proposed changes in the Draft NPPF may not be taken forward in full.

It should be noted that a House of Commons Committee recently published a report on “Reforms to national planning policy”, for example stating: “*The Government has not provided sufficient evidence to demonstrate how the policy of removing mandatory local housing targets will directly lead to more housebuilding.*”

### Dacorum’s Local Housing Need (LHN)

- 5.2.7 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (the ‘cities uplift’, which does not apply to Dacorum).
- 5.2.8 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input must be the 2014-based projections, rather than more recent projections (with reasons set out clearly at [paragraph 5](#) of the PPG on housing needs assessment). This approach was most recently [reconfirmed](#) in December 2022.

<sup>6</sup> The NPPF was updated in September 2023, but only in respect of onshore wind power.

- 5.2.9 The standard method derived LHN for the Borough is currently **1,018 dwellings per annum** (dpa), or 16,288 homes in total over the plan period. This is a ‘capped’ figure, meaning that Step 3 of the standard method (“Capping the level of any increase”) applies. The uncapped figure is 1,175 dpa, and it should be noted that the PPG states: “*Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered.*”
- 5.2.10 With regard to Step 2 (“An adjustment to take account of affordability”), housing affordability has worsened in Dacorum over recent years. The latest ratio of house prices to local wages is 13.86, which is a small increase from 2021, but a notable increase from 2020 (11.99). Prior to 2014 the ratio was below 10.

#### **Is it reasonable to explore setting the housing requirement at a figure below LHN?**

- 5.2.11 In short, the answer is ‘yes’, for the reasons already set out in Section 2. More specifically, there is a case for exploring the possibility of setting the housing requirement figure below LHN given NPPF paragraph 11, which currently states (not accounting for the Draft NPPF of December 2022):

“*... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*” [emphasis added]

- 5.2.12 Dacorum is heavily constrained by NPPF “*policies... that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area*”. In particular, the London Metropolitan Green Belt constrains all higher order settlements; much of the land not designated as Green Belt forms part of the Chilterns AONB; and the Chilterns Beechwoods SAC is also a very significant constraint to development, albeit a Mitigation Strategy is now in place.
- 5.2.13 Also, at this point, it is important to recall proposed additions to the NPPF (December 2022) - see Box 5.1.
- 5.2.14 On the basis of the points discussed above, there is a clear strategic argument for exploring growth scenarios that would involve setting the housing requirement at a figure below LHN and, in turn, generating unmet housing needs that could then pass to one or more neighbouring or nearby local authorities.
- 5.2.15 However, on the other hand, there is a strong argument for ruling out “very low growth”. This reflects:
- The extent of housing need(s) locally, including affordable housing needs.
  - Understanding that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, for example in terms of supporting communities, health and wellbeing, strategic infrastructure delivery and the local economy.<sup>7</sup>
  - The fact that Dacorum sits within a constrained sub-region where unmet housing need is already an issue, with the reality being that there is little or no confidence regarding where, when or even if any unmet housing need generated by the Dacorum Local Plan would be provided for. There are clear sustainability arguments for providing for unmet need close to the source of need, but this could prove very challenging in the Dacorum context, at least in the absence of a sub-regional or regional plan. A South West Herts Joint Strategic Plan is preparation, but its timetable and remit/scope is uncertain.
- 5.2.16 Finally, it should be noted that the option of setting the housing requirement below LHN was ruled-out as unreasonable in **2020**, with Table 5-3 within the Interim SA Report explaining that “the only option” would be to export unmet need to St Albans, but a clear barrier to doing so is the fact that St Albans struggles to provide for locally arising needs. The situation has evolved since 2020, but it remains the case that there is no confidence in respect of the ability to successfully export unmet needs to a neighbouring area. With regards to St Albans, it should be noted that local plan growth scenarios involving setting the housing requirement at a figure above LHN were recently ruled out as unreasonable (see paragraph 5.5.9 of the Interim SA Report recently published for consultation alongside the Draft St Albans Local Plan).

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<sup>7</sup> This is an important consideration including in light of the following proposed addition to paragraph 140 of the NPPF (December 2022): “*Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.*” This could be read as suggesting that, in order to build a case for reviewing Green Belt boundaries through a local plan, there is a need to take into account factors other than housing need.

### **Is it reasonable to explore setting the housing requirement at a figure above LHN?**

- 5.2.17 There are number of high-level arguments potentially in support of exploring growth scenarios that would involve setting the housing requirement at a figure above LHN.
- 5.2.18 Firstly, as discussed above, the '**uncapped**' LHN figure for Dacorum is higher than the figure derived from the standard method (which involves applying a cap).
- 5.2.19 Secondly, there is a need to consider **affordable housing need**, recognising that the PPG states:
- "An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."*
- 5.2.20 Affordable housing need is high locally. Specifically, the SW Herts Local Housing Needs Assessment ([LHNA](#), 2020) identifies a need for 336 affordable homes to rent per annum plus a need for 248 homes per annum for affordable home ownership. The combined figure (611 dpa) is high in comparison to LHN (1,018 dpa) given that market housing schemes typically deliver affordable housing at a rate of 20-40%.
- 5.2.21 Furthermore, there is a need to consider the recent rates of affordable housing delivery, as understood from the past five [Authority Monitoring Reports](#), which range from 19% to 39.5% of total completions in each year. There is also a need to consider the breakdown by tenure, given the LHNA recommendation that the SW Herts authorities should "*seek to deliver as much affordable housing to rent as viability allows.*"
- 5.2.22 Having said this, it is not realistic to consider very high growth scenarios with a view to meeting affordable housing needs, as need/demand for market housing becomes a limiting factor on housing delivery.
- 5.2.23 Thirdly, there is a need to consider **unmet housing need** from elsewhere, recognising that the NPPF states that authorities should:
- "... establish a housing requirement figure... which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period."*
- 5.2.24 The "positively prepared" test of soundness is also clear that local plan housing requirements should be:
- "informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development."*
- 5.2.25 However, there are significant draft proposed changes (December 2022; see Box 5.1) that potentially have the effect of reducing the emphasis - within the NPPF - on providing for unmet need.
- 5.2.26 Unmet housing need is an issue within the sub-region - see Box 5.2.
- 5.2.27 Fourthly, there is a need to briefly consider **growth-related opportunities**, noting that the Draft NPPF proposes the following addition to paragraph 66 [emphasis added]:
- "The [housing] requirement may be higher than [LHN] if it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment."*
- 5.2.28 However, such arguments are not thought to apply strongly to Dacorum. There is an economic growth opportunity, but the LHNA states that there is no economic case for an 'above LHN' housing requirement.
- 5.2.29 Finally, it is recognised that the option of setting the housing requirement at a figure above LHN was **previously considered 'reasonable'** to the extent that it warranted formal appraisal within the Interim SA Report (2020; see [Section 5.3](#)). The appraisal found higher growth to perform relatively poorly in terms of a range of environmental topics/objectives (whilst emphasising uncertainty in the absence of defined growth locations) but also found:
- "In terms of the social and economic SA objectives, in general terms the higher level of growth (Option E) performs the best as it would result in housing levels that would provide a number and range of homes to meet future needs of the Borough, particularly in relation to affordable housing."*

### **Box 5.2: Discussion of unmet housing need**

The SW Herts Joint Strategic Plan (JSP) may prove well-placed to deal with unmet housing need. However, this will be in the longer term, looking to 2050. As such, the Dacorum Local Plan must remain alive to potential unmet housing need, particularly that arising from adjacent or otherwise well-linked neighbouring authorities.

Unmet need risk typically emanates outwards from London, and the current situation for the Dacorum Local Plan is no exception. However, in the case of the Dacorum Local Plan, there is also a need to consider risk of unmet need emanating from the west (Bucks), North (Luton / Central Beds) and from the east (St Albans).

#### **Risk of unmet need from the south**

Beginning with **Three Rivers District**, in early 2023 Regulation 18 consultation proposed three new allocations for a total of a housing supply of 825 homes. Additionally, a consultation in 2021 proposed supply of 8,973 homes, leading to a total supply of 9,798 homes, which is 1,318 homes short of the standard-method derived LHN figure. Assuming the need for a supply buffer (i.e. a need to ensure supply in excess of the housing requirement), the unmet need figure might increase to ~1,500 homes. Additionally, the most recent consultation document (see paragraph 2.2) discusses a need to reduce the supply by 438 homes (due to issues with certain of the sites proposed for allocation in 2021), which might lead to unmet need in the region of 2,000 homes.

Most recently (August 2023), the Council published a [statement](#) setting out that local plan supply will be 4,852 homes. After accounting for a supply buffer, this could lead to a set housing requirement at perhaps 4,400 homes and, in turn, unmet housing need in the region of **7,000 homes**.

Moving east to **Watford Borough**, the adopted Local Plan (2022) sets the housing requirement at LHN. As such, the conclusion is no risk of unmet need. However, there is a need to note the recent Authority Monitoring Report (March 2022), from which it is [clear](#) that meeting the requirement may prove challenging.

The final authority in this sector is then **Hertsmere Borough**. A draft local plan was published in 2021, proposing to provide for housing need in full. However, a [report](#) to Full Council in 2022 explained that the consultation generated a very large number of responses and “*the vast majority of the responses expressed objection to the level of new development.*” The Full Council then resolved to “set aside” the Local Plan, as previously published, but to continue to work on a local plan. As such, there is a risk of **significant unmet need**. There is currently no certainty on the timetable for progressing the plan / confirming unmet need (if any), but it is noted that a recent [appeal](#) (of a refused planning application) confirmed that the Borough has 2.3 years of deliverable housing sites, i.e. is not able to demonstrate a five year housing land supply. This may stimulate plan-making.

Finally, there is a need to note the risk of unmet need from **London boroughs**. The Barnet Local Plan is progressing well, but the same cannot be said for the Enfield Local Plan, whilst Harrow has seemingly not undertaken any local plan-making work since a Site Allocations Plan was adopted in 2013. In both the case of the submitted [Barnet](#) Local Plan (2021) and the Draft [Enfield](#) Local Plan (2021) the proposal is to provide for the London Plan requirement, but the plan documents are clear that housing need is potentially much higher and, indeed, potentially even more than double the London Plan requirement. The next London Plan will need to deal with housing needs as fully as possible and potentially seek locations to meet unmet housing need.

#### **Buckinghamshire**

The local plan is at an early stage of development, with no available information to inform a discussion of unmet need risk. The local plan area is extensive (many times the size of Dacorum) and includes both extensive areas that are heavily constrained by national designations and areas that are relatively unconstrained. Unmet need from heavily constrained Slough is a clear issue to consider as part of the plan-making process.

#### **Luton / Central Beds**

Both authorities are at the early stages of a local plan review. Unmet need from Luton could well be an issue, and it is recognised that Markyate (within Dacorum) relates closely to Luton. However, Markyate is constrained by the Green Belt and AONB, whilst Central Beds includes extensive land unconstrained in these respects.

#### **St Albans District**

A Draft Plan was recently proposed for consultation proposing to set the housing requirement at LHN (via a proposed supply amounting to LHN plus 6%, i.e. a ‘supply buffer’). However, the Council remains open to considering setting the housing requirement at a figure below LHN (as understood from the [Interim SA Report](#)).

### Conclusion on housing quanta options

- 5.2.30 The high level discussion above serves to suggest a need to remain open to the possibility of a range of growth quanta scenarios, which leads to an inherent challenge for plan-making. Specifically, in light of the high-level discussion above, the housing requirement might reasonably be set:
- **Below LHN** – given the extent of growth constraints affecting Dacorum, including the protected areas listed in footnote 7 of the NPPF.
  - **Above LHN** – given the risk of significant unmet housing need, notably from Three Rivers District.
  - **At LHN** – this is essentially the default option, and a focus on supply scenarios that would enable the housing requirement to be set at LHN could be conducive to an expedient plan-making process. It is also important to note that the plan is being prepared under the 2021 version of the NPPF that has been widely described as having its core “mandatory housing targets”. We do not believe this to be the case; however, the reality is that most local plans do set the requirement precisely at LHN.
- 5.2.31 In this light, DBC officers (in discussion with AECOM) were able to reach a conclusion that attention should focus on scenarios involving a level of supply sufficient to enable the housing requirement to be set at a figure that falls somewhere in the middle of the above range, e.g. **10-15% either side of LHN**.
- 5.2.32 The question of precise quanta figures to reflect across the growth scenarios is returned to within **Section 5.5**, subsequent to consideration of broad distribution, site options and sub-area scenarios.

#### **Box 5.3: A note on employment land need**

The South West Herts Economic Study Update ([2019](#); N.B. a further update is forthcoming) considers a series of scenarios for future demand in respect of both office space and industrial land, ultimately supporting the highest growth scenarios for office space and (in particular) industrial land. For industrial land it states: “*Although this is a considerable change we believe it is justified by the consistently strong levels of demand for industrial space in South West Herts, which could have been even higher if the market was not undersupplied.*”

The study then considers supply, before predicting: an over-supply across the sub-region in respect of office space (but an undersupply in Dacorum); and a large undersupply in respect of industrial land (including a large undersupply within Dacorum). There is, however, a need to note the St Albans Local Plan proposal to significantly expand the Maylands Business Park (at the eastern edge of Hemel Hempstead).

#### **Box 5.4: A note on the relationship between supply and the housing requirement**

There is invariably a need to provide for a supply buffer over-and-above the housing requirement. This is to ensure that the requirement is met in practice over the plan period, i.e. there is a robust supply ‘trajectory’, recognising that unforeseen delivery issues inevitably occur prior to and at the planning application stage. A ‘robust supply trajectory’ involves a situation whereby a five-year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period, and the Housing Delivery Test (HDT) can be met when applied annually.

There is also a need to consider the question of a constant/consistent versus a stepped housing requirement. The ideal situation involves a consistent housing requirement over the entire plan period. However, under the Government’s PPG, there is flexibility to set a ‘stepped’ housing requirement (and, in turn, supply trajectory), where there is evidence to demonstrate that this is necessary. A stepped requirement / trajectory is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then compensated for in the latter years of the plan.

The following statement from the Uttlesford Local Plan Inspector’s Report (2020; available [here](#)) is indicative of the flexibility that exists in respect of committing to a stepped housing requirement through a local plan:

*“In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year housing land supply... This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing. It would also create a buffer so the target of 14,000 homes is not only just being met by a narrow margin and would allow for a less steeply stepped housing trajectory”.*

## Broad distribution

5.2.33 This is the second of two sections examining ‘strategic factors’ of relevance to the matter of defining reasonable growth scenarios for the Local Plan. The aim is to explore broad distribution issues / options as well as the question of broad growth typologies that are supported, e.g. strategic versus non-strategic.

5.2.34 The aim here is not to present a comprehensive review, as there is also the potential to introduce strategic issues and opportunities within the sections of this report that follow, but key strategic factors include:

- **Hemel Garden Communities (HGC)** – has strong support amongst partner organisations (Dacorum Borough Council, St Albans City and District Council, Hertfordshire County Council, Hertfordshire Local Enterprise Partnership and Herts IQ), with a [position statement](#) recently published. Despite sensitivities, including the adjacent Chilterns AONB, HGC potentially represents an opportunity to deliver growth in a way that minimises negative impacts and realises growth-related opportunities including town-wide change. Without HGC there would be a need to make very difficult decisions in respect of: A) not meeting development needs (i.e. generating unmet needs); and/or B) releasing land from the Green Belt at the edge of settlements (given a lack of new settlement options locally; see Section 5.3). There is every chance that such decisions would prove politically too difficult, such that there would be a risk of the Local Plan failing, and there is also a need to consider implications for progression of the St Albans Local Plan, recognising that HGC is a central component of their Draft Local Plan published for [consultation](#) in July 2023. Failed local plans would undoubtedly lead to a high risk of ‘planning by appeal’ locally (e.g. the outcome of an [appeal](#) for a 1,400 home scheme to the east of Tring is currently awaited).

Much work has been completed, including work to consider options/alternatives. For example, a [presentation](#) in September 2022 explained that scenarios are being examined involving between 9,600 and 11,500 new homes and with a focus on exploring implications for three key issues: the Gade Valley (linked to the Chilterns AONB sensitivity), SANG provision and secondary school provision. These key issues do serve to suggest the possibility of considering a weighting of growth away from the Dacorum part of HGC; however, no work has been undertaken to consider scenarios of this nature. It is clearly the case that HGC aims to be more than the sum of its component parts, and the scheme as a whole would not be able to progress without support from all of the key partner organisations listed above.

With regards to specific opportunities to be realised via HGC, these are a focus of discussion within the appraisal sections below, but key opportunities include: delivering extensive Suitable Alternative Natural Greenspace (SANG) alongside new homes in order to mitigate recreational pressure on the Chilterns Beechwoods SAC; supporting regeneration and job creation within Hemel Hempstead, including within those local centres close to HGC; delivering enhanced public and active transport connectivity, to include a major enhancement to the Nicky Line cycle route; supporting the aspirations for the A414 corridor (including [HERT](#)); and delivering expansion of Maylands Business Park (the largest component of Herts IQ). A further specific issue is meeting Gypsy and Traveller accommodation needs, which would likely prove very challenging within the sub-region without delivery of one or more new sites within HGC.

In conclusion, whilst HGC is not a fait accompli, it is difficult to envisage how the sub-region’s housing needs could be met without it. The equivalent is Harlow-Gilston Garden Town in Essex, which is now allocated and is crucially important for meeting housing needs for the Harlow / Epping Forest / East Herts sub-region. In this light, there is a strong argument to suggest that ‘no HGC’ growth scenarios are unreasonable, and that testing such scenarios would amount to an unhelpful distraction. However, on the other hand, not testing ‘no HGC’ growth scenarios could lead to a risk of challenge. The matter of HGC options to progress to the reasonable alternative growth scenarios is discussed further below.

Key figures from the HGC Position Statement (2023) are presented below.

- **Chilterns Beechwoods SAC** – a recreational pressure [Mitigation Strategy](#) is now in place, following a period when the Council was unable to issue decisions on planning applications principally involving net new residential development. The Strategy requires that all new affected developments within a 12.6km ‘Zone of Influence’ – which covers all of Dacorum and a small proportion of several other authorities – make provision for Suitable Alternative Natural Greenspace (SANG) and a contribution to Strategic Access Management and Monitoring (SAMMS). The Strategy includes detailed guidance for Dacorum, including a protocol “*to ensure that the Council provides a SANG solution [known as ‘strategic SANG’] to those developments where [it cannot] to be provided on site.*” Where a development relies on Strategic SANG it must make a contribution to its management and maintenance, as discussed [here](#).

The protocol is strict, including by requiring that headroom capacity is maintained at strategic SANG to accommodate windfall development. Timing is also important, in that development cannot come forward ahead of SANG capacity and cannot ‘hold’ allocated SANG capacity if development is delayed.

- **Strategic sites** – regardless of whether or not there is support for HGC, there is a clear argument for ensuring a strong focus on strategic sites, i.e. sites delivering at least several hundred homes that are suited to comprehensive masterplanning and tend to support a mix of uses onsite and delivery of new / upgraded infrastructure alongside new housing; also SANG. This is evidenced by work completed to date on the South West Herts Joint Strategic Plan (JSP) as well as the work of the Hertfordshire CC Growth and Infrastructure Unit and the Hertfordshire Growth Board. Strategic sites can also be well-suited to integrating one or more sites for Gypsies and Travellers, which is a significant issue locally.
- **Smaller sites** – a key lesson learned from the experience of local plans elsewhere is that there is a need for a good mix of sites, to include smaller sites. A good mix of sites is important from a perspective of seeking to minimise delivery risk (and, in turn, ensuring that the Local Plan remains up-to-date; see Section 2), but there are also wider merits to smaller sites, notably: the NPPF supports smaller sites because they can allow for “*opportunities for villages to grow and thrive...*”; smaller sites are suited to delivery by SME housebuilders; and small sites can sometimes be developed with limited Green Belt impact. There can also be a traffic argument for dispersing growth across smaller sites; on the other hand, focusing growth (at strategic sites or along transport corridors) can support early and effective transport planning, including for strategic upgrades.
- **Settlement hierarchy** – a key concern raised through the Draft Local Plan consultation related to the proportion of growth directed to Berkhamsted and Tring (29%), hence there is a now a case for exploring growth scenarios involving an increased proportion of growth directed to Hemel Hempstead. However, Berkhamsted and Tring must still receive a share of growth reflective of their position in the settlement hierarchy. There is no clear case for a major departure from the settlement hierarchy for either town.
- There is also an important question regarding distribution of growth to and between the three villages within the third tier of the settlement hierarchy – Bovingdon, Kings Langley and Markyate. Matters are discussed further in Section 5.4, but it is fair to say that strategic arguments for growth are highest at Kings Langley and lowest at Markyate. None of these villages is associated with a clear opportunity for transformational growth, i.e. growth that leads to creation of a new second tier settlement.
- **Urban supply** – another key message received through the Draft Local Plan consultation related to maximising housing growth within urban areas, and the opportunities for doing so are almost exclusively found within Hemel Hempstead. This means reviewing existing employment and retail sites/designations across the town, but there are also two key regeneration areas, namely: 1) Hemel town centre, guided by an adopted [Vision](#); and 2) the Two Waters Opportunity Area, guided by the findings of a [consultation](#) held in 2022. Much detailed work has been completed around urban capacity, with the outcome that there is now considered to be the potential to significantly boost the supply of homes from the Hemel urban area relative to the proposal in 2020. This is broadly supported; however, there can be issues and potential trade-offs (e.g. loss of employment land) and there is also a need to recognise that urban housing supply is invariably associated with a relatively high delivery risk.
- **AONB and Green Belt** – at the Draft Plan stage it was established that there are clearly exceptional circumstances that warrant releasing land from the Green Belt for development, but no development was proposed in the AONB. Moving forward there is a renewed focus on minimising harm to the Green Belt (including given Government announcements and the Draft NPPF of December 2022), and it remains the case that there is very limited or no case to be made for allocating in the AONB. Focusing on the Green Belt, the Stage 2 Green Belt Study (2016) notably explained: “*In the Dacorum context, where the majority of built form and population is concentrated within the constraints of narrow river valleys, [Green Belt] has been particularly important to maintaining the settlement pattern and preventing ribbon development, as well as the outward sprawl of settlements into typically unspoilt... countryside.*”
- **Transport connectivity** – has implications for wide-ranging sustainability objectives. The option of focusing growth along transport corridors was found to perform strongly through the recent SW Herts JSP [consultation](#), and the option of ‘growing the best-connected places’ also performed well (linked to aligning growth with the settlement hierarchy). One strategic matter is the A414 corridor, including a possible Herts-Essex Mass Rapid Transit (HERT). A consultation was held in 2021, but there has been limited progress since that time. A presentation in [2021](#) emphasised the challenges of delivering HERT.

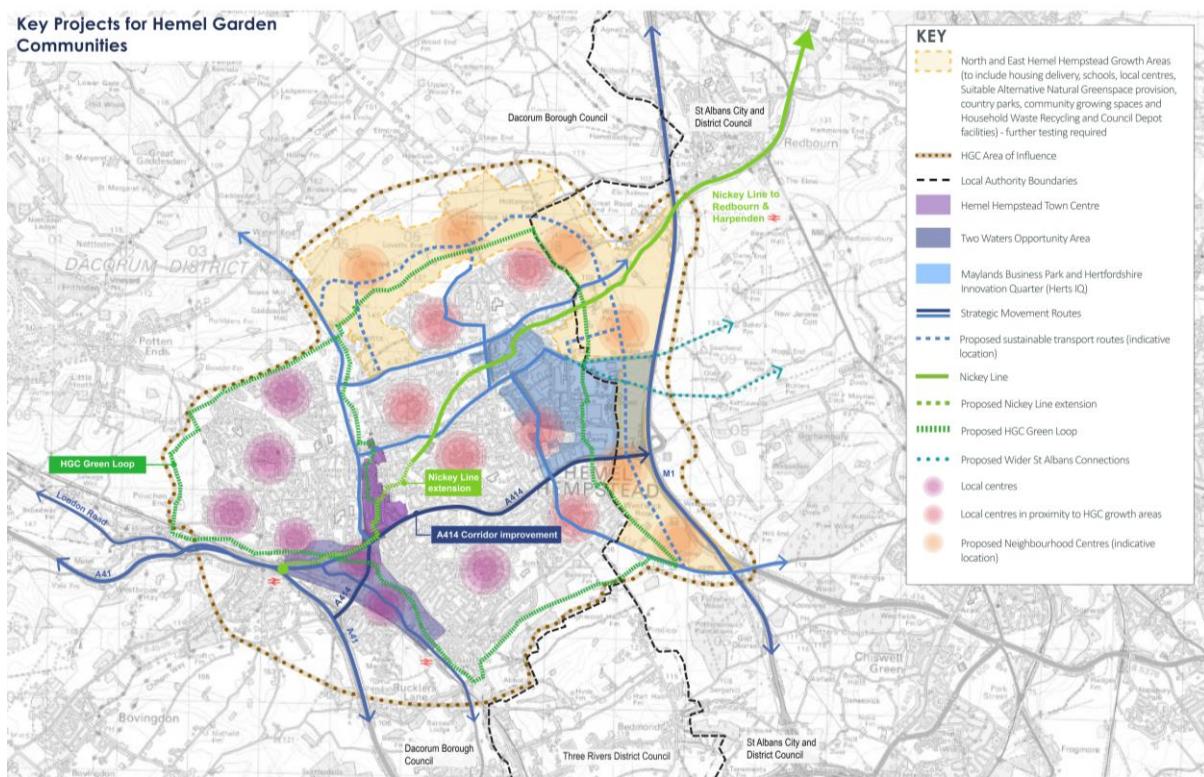
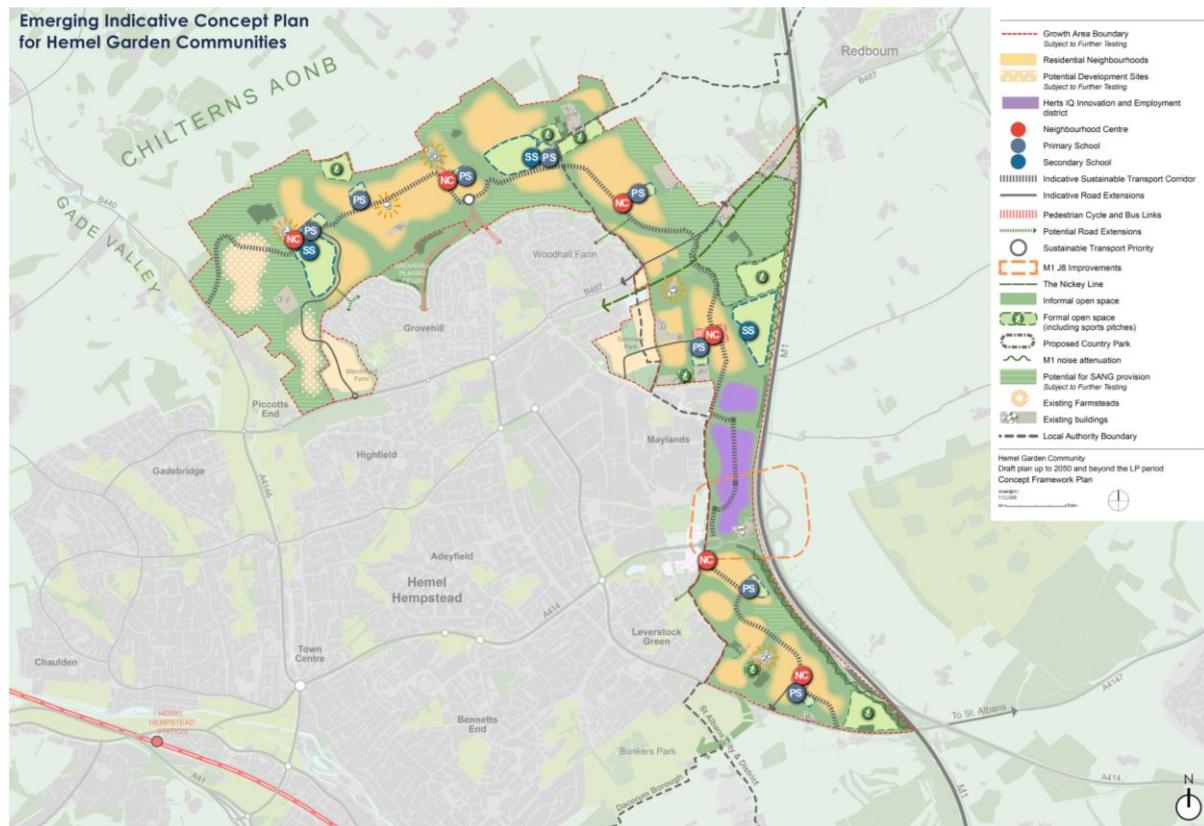
**Hertfordshire County Council  
Growth & Infrastructure Unit**

**Local & Joint Strategic Plans  
Engagement Document**



Version 3, June 2022



**Figure 5.2: Key projects for HGC (July 2023)****Figure 5.3: The emerging indicative concept plan for HGC (July 2023)**

## 5.3 Site options

### Introduction

- 5.3.1 The aim of this section is to introduce the long list of available site options feasibly in contention for allocation and the work that has been undertaken to appraise and 'sift' site options, in order to arrive at a manageable shortlist that can then be a focus of work to explore sub-area scenarios in Section 5.4.
- 5.3.2 To recap, this is a 'bottom-up' workstream undertaken as a component of the wider process of defining reasonable alternative (RA) growth scenarios for appraisal and consultation (see Figure 5.1).
- 5.3.3 This section covers:
- Strategic Housing Land Availability Assessment (SHLAA)
  - Urban capacity
  - Green Belt Review
  - New settlement options
  - Sustainability appraisal
  - Officer-led site assessment

### SHLAA

- 5.3.4 The SHLAA amounts to an *initial* shortlisting exercise, identifying sites that are available, achievable and *potentially* suitable for development. A key aim is to differentiate between sites that are 'deliverable', meaning that they could potentially come forward within five years, and sites that are 'developable' meaning that they could potentially come forward later in the plan period. The outcome of the SHLAA is a list of deliverable and developable sites with a total combined capacity far in excess of what is needed.

### Urban capacity

- 5.3.5 This is an input to the SHLAA, but warrants stand-alone discussion, as a key workstream.
- 5.3.6 Establishing urban capacity is largely a technical exercise, with little in the way of strategic policy choice that warrants being a focus of SA. However, there are some key issues around urban capacity locally – primarily within Hemel Hempstead – that do warrant further consideration below. Key issues relate to:
- Delivery risk/certainty – there is a need to avoid overreliance on urban supply, given inherent delivery challenges, for example relating to complex land ownership / leaseholds and existing use values that impact on development viability. It is also important to avoid any double counting of urban capacity and the identified windfall assumption. As discussed above, a local plan strategy with high delivery risk can amount to storing up potential issues for the future, i.e. the plan implementation period.
  - Density (building heights and massing) – it can sometimes be the case for local plans that there is a strategic policy choice to explore through SA, but it is not clear that this is the case for Dacorum (Hemel), i.e. it is thought that a suitably objective and proportionate view on density can be taken on the basis of technical evidence. It is important to avoid overly high density assumptions that can be challenged at the planning application stage and can also lead to delivery challenges and viability issues.
  - Existing uses – there is a need to apply due caution before supporting the redevelopment of existing employment land for housing or mixed use development. This does apply to Dacorum, as meeting employment land needs is challenging; however, concerns are reduced on the assumption that Maylands Business Park can/will expand significantly. Also, there is a need to consider that land currently used for non-residential uses (e.g. employment, retail, car-parking) can sometimes tend to be subject to flood risk and potentially other constraints, e.g. noise or ground contamination.
  - Infrastructure – there are wide-ranging infrastructure considerations around maximising urban capacity, but one issue for Hemel Hempstead is around ensuring sufficient primary school capacity. There are clear arguments for delivering increased capacity in greenfield locations – e.g. where there is space for playing fields – as opposed to delivering new primary school capacity on constrained urban sites.

5.3.7 In light of the above, it can be seen that there is inherently limited scope to define reasonable alternatives in respect of the assumed supply from the Hemel Hempstead urban area. Concluding considerations are:

- On the one hand, the increase in supply identified since the Draft Plan stage (up from 2,800 to 3,750 in total across the two opportunity areas) warrants scrutiny. It is noted that the Site Selection [Topic Paper](#) published in 2020 emphasised that the proposed urban supply at that time represented a 20% uplift on average annual delivery rates, and also explained: “*The Council considers it unlikely that any further reviews [will] result in the significantly higher capacity... that is both realistic and deliverable.*”

Also, it is noted that the windfall assumption has increased by 600 homes since the Draft Plan Stage (and the windfall assumption at the Draft Plan stage was an increase on the previous Core Strategy). One consideration is continuation of recent trends in respect of permitted development.

- However, on the other hand, increased capacity has been identified on the basis of detailed work, e.g. the [Urban Analysis](#) underpinning the recent Town Centre Vision. Also, it is important to note that the Town Centre Vision presents numerous [Opportunity Sites](#) over-and-above those from which housing supply is assumed as part of the proposed Local Plan supply.

5.3.8 The matter of urban supply is discussed further in Section 5.4. Also, it is important to note that the question of an appropriate supply buffer – to account for delivery risk – is discussed in Section 5.5.

## Green Belt Review

5.3.9 Green Belt Review has been undertaken in three stages, and it is important to note that no further work has been carried out since the Stage 3 Review was published in 2020.

5.3.10 The **Stage 1** report (2013) identified three [strategic parcels](#) that might be considered further for allocation, on the basis that they contribute to Green Belt purposes to a relatively limited extent:

- South of Hemel Hempstead – specifically land south of Apsley Station / Two waters.
- South of Berkhamsted – specifically land between the town and the A41.
- West of Tring – specifically land between the town and the A41 junction (now permitted).

5.3.11 The **Stage 2** Report then split all land surrounding the main settlements into discrete parcels and examined each in turn. Figure 5.4 is taken from the report and shows the overall contribution of each parcel to the Green Belt purposes (highlighting considerable variability, e.g. with land east of Tring and north of Hemel Hempstead contributing strongly). The report also went further, examining select parcels in terms of A) potential to define new defensible Green Belt boundaries; and B) landscape and wider constraints. Having done so, [Table 7-3](#) of the report concludes by identifying 25 refined parcels for further consideration (mostly comprising ‘less constrained’ land but also including some ‘more constrained’ land).

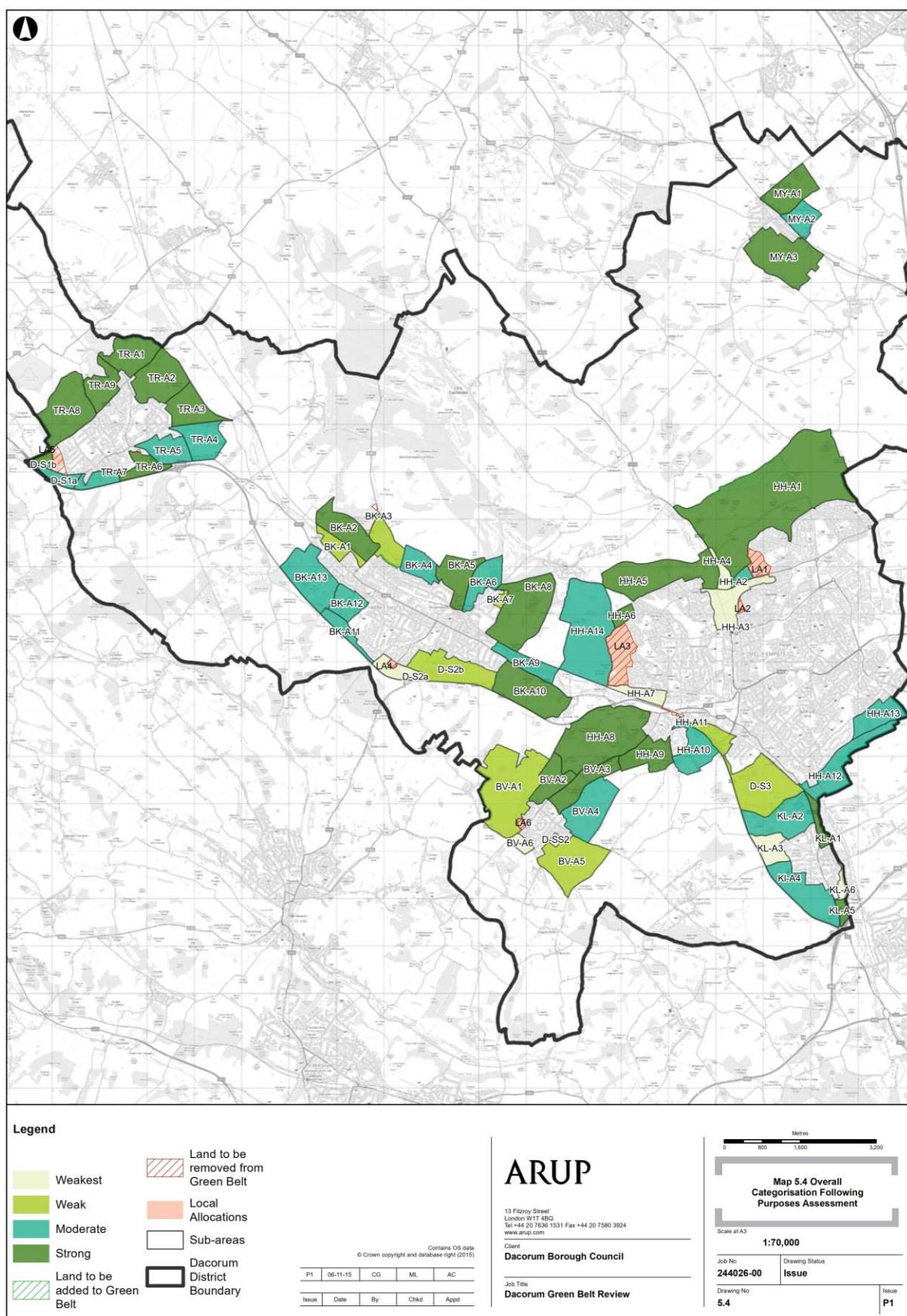
5.3.12 Finally, the **Stage 3** report examined all of the proposed allocations within the Draft Local Plan (2020). The report did not differentiate between the sites in terms of Green Belt sensitivity, but rather: A) identified sites with weaker boundaries that would need to be strengthened; and B) identified potential anomalies that could result from releasing sites from the Green Belt (unless additional land is also released). As a separate exercise the report also categorised each site in terms of landscape value and sensitivity.

## New settlement options

5.3.13 There are only two options – Bovingdon Airfield and ‘Land near to Long Marston’ – both of which were assessed within the Site Selection Topic Paper and the Interim SA Report at the Draft Plan stage (2020).

5.3.14 Bovingdon Airfield performs relatively well in some locational respects, and comprises brownfield land, but is not currently available. It is in active use for the film and television industry, with policy support set out in the Draft Plan (2020). Land near to Long Marston was promoted as available in 2020, and benefits from a single landowner, but little detailed work has been undertaken, e.g. no concept masterplan has been submitted. The site has the theoretical benefit of linking to the Oxford to Cambridge Arc, which is a national growth area, but the land in question is constrained (flood risk, historic environment terms and AONB setting) and has poor transport connections (albeit Cheddington station is nearby).

5.3.15 Overall, these are judged to perform poorly, including from a delivery perspective, such that they do not warrant further consideration in Section 5.4.

**Figure 5.4: Outcome of the Stage 2 Green Belt Review (2016) – performance of parcels against NPPF purposes**

## Sustainability appraisal

- 5.3.16 At the Draft Plan stage (2020) the Interim SA Report ([Appendix E](#)) presented a detailed appraisal of all shortlisted site options. This was helpful analysis, but the decision was taken not to update the analysis for the purposes of informing plan-making / RA growth scenarios / consultation at this current stage.
- 5.3.17 This decision reflects a view that site options are not reasonable alternatives (as discussed in Section 5.4) and must be given proportionate consideration accordingly. Also, the reality is that the methodology applied to the appraisal of site options in 2020 (Appendix E of the Interim SA Report) is not straightforward to interrogate and, in turn, replicate. It involves qualitative analysis / application of professional judgement applied across a large number of site options, which invariably gives rise to a risk of inconsistency.

## Officer-led site assessment

- 5.3.18 DBC officers prepared a **Site Selection Topic Paper in 2020** that explained a lengthy shortlisting process and then presented detailed analysis for a shortlist of 37 non-urban site options.
- 5.3.19 The shortlisting process notably included ruling-out all sites at the fourth tier in the settlement hierarchy, namely the Selected Small Villages. The Topic Paper described how this decision is more marginal for Long Marston and Wilstone, including because these villages are located outside of the Green Belt. However, it is considered justified on balance, particularly from a transport and accessibility perspective. Also, there is the potential for the Parish Council to allocate housing sites within a Neighbourhood Plan.
- 5.3.20 The Topic Paper (2020) assessed each of the 37 sites in a proforma under the following headings:
- Urban design principles
  - Access, highways and sustainable transport
  - Social, community and environmental health
  - Landscape
  - Biodiversity and green infrastructure
  - Historic environment and cultural heritage
  - Flood risk and drainage
- 5.3.21 Additionally, each proforma summarised the outcomes of the SA work discussed above.
- 5.3.22 The 37 shortlisted site options, plus a small number of additional sites submitted to the Council through the consultation in 2020, are the focus of discussion within Section 5.4.
- 5.3.23 Clearly there has been a range of work undertaken by officers since 2020 to explore issues and options relating to specific sites, including ongoing discussions with site promoters. However, the decision was taken not to update the proforma analysis presented in the 2020 Topic Paper.

### Why has the Site Selection Topic Paper not been updated?

- 5.3.24 The reason why the Site Selection Topic Paper (2020) has not simply been updated (such that it could then feed into the analysis in Section 5.4) is because SANG capacity is now an overwhelmingly important 'driver' of spatial strategy and site selection, which was not the case in 2020. Officers are clear that Green Belt sites should be supported by their own SANG solution rather than reliance on DBC SANG which is principally there to serve urban and smaller/windfall sites that are unable to deliver bespoke SANG.
- 5.3.25 After having maximised urban supply and supply from non-urban sites with a SANG solution there is a strong case to be made by not looking any further, i.e. not looking at other sites without a SANG solution.
- 5.3.26 This is a reasonable and proportionate approach to take at this stage in the plan-making process. However, for SA purposes it is considered appropriate to keep site options without an identified SANG solution in contention, recognising that new SANG solutions can, and likely will, be identified over time.

## Conclusion

- 5.3.27 In conclusion, a proportionate amount of work has been undertaken to examine site options in isolation, which feeds into the discussion of sub-area options / growth scenarios in Section 5.4.

## 5.4 Sub-area scenarios

### Introduction

- 5.4.1 Discussion has so far focused on A) 'top down' considerations of housing quantum and broad distribution issues / options; and B) 'bottom-up' consideration of site options. The next step is to consider each of the Borough's sub-areas in turn, exploring how sites might be allocated/ supported in combination.

#### What sub-areas?

- 5.4.2 It is quite clearly the case that each of the higher order settlements warrants being considered in turn, with a final discussion then dealing with 'the rest of the borough'. Hence sub-areas are:

- Hemel Hempstead
- Berkhamsted
- Tring
- Kings Langley
- Bovingdon
- Markyate
- Rest of the Borough

#### Methodology

- 5.4.3 The aim of this section is to conclude on reasonable sub-area scenarios that need to be taken forward to Section 5.5 of the report, where sub-area scenarios are combined in order to arrive at reasonable growth scenarios for the Borough as a whole. The aim is *not* to present an appraisal of reasonable alternatives.
- 5.4.4 Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to precisely the same level of detail, but rather to focus attention on those options (and site combinations / scenarios) *judged to be more marginal*, i.e. where the question of whether or how to take the option forward is more finely balanced. This approach reflects the legal requirement, which is to report "outline reasons" for selecting reasonable alternatives.

#### Structure of each sub-area section

- 5.4.5 Each of the sections begins with a discussion of the context to growth and strategic issues / opportunities including, and importantly, in respect of SANG capacity. This is then followed by a discussion of recent and permitted housing sites and a windfall assumption. Having discussed housing supply from these sources it is possible to understand the broad number of homes required from new supply via the local plan (i.e. allocations and potentially broad locations, in line with the NPPF paragraph 68).
- 5.4.6 New supply options are then discussed in a broad sequential order of preference, which involves firstly discussing urban options (primarily a consideration for Hemel Hempstead) and greenfield options not involving Green Belt release (which includes several existing allocations from the Site Allocations DPD).
- 5.4.7 A map is then presented to inform the discussion of Green Belt options.
- 5.4.8 Specifically, presented below are the maps from the current Revised Growth Strategy consultation document, which show: A) the emerging preferred allocations; and B) sites that were a proposed allocation at the Draft Plan Stage (2020), but which are now 'deleted'. This is considered a pragmatic approach, as attention does naturally focus on these sites. However, there are also a number of *other sites options* to consider (i.e. sites other than the current preferred options and sites previously supported in 2020). For other sites hyperlinks are provided to maps in the Site Selection Topic Paper (SSTP) (2020).
- 5.4.9 A final section then concludes on reasonable growth scenarios to progress to Section 5.5. There is a need to apply a degree of pragmatism, with a view to a manageable process in Section 5.5, where sub-area scenarios are combined to form borough-wide reasonable growth scenarios. Further work to explore sub-area scenarios – potentially to include formal appraisal – can be undertaken at the next stage of plan-making, hence suggestions for reasonable sub-area scenarios to explore are welcomed.

## Hemel Hempstead

- 5.4.10 Hemel Hempstead is the largest settlement in the borough, and benefits from a combination of excellent access to infrastructure, jobs and the countryside. It is the Borough's focus for key services and facilities, employment, shopping and leisure. It performs a key strategic function within the sub-region.
- 5.4.11 Environmental and historic environment constraints to growth are arguably *relatively* limited in certain key respects, given: A) the mid-20<sup>th</sup> Century new town heritage; and B) a position in the rolling countryside of the Chilterns dip-slope, as opposed Berkhamsted (a steep-sided valley) and Tring (closely related to the Chilterns escarpment). However, there are a range of key constraints to growth, and there is generally a need to avoid 'sprawl', noting the sensitivity of Green Belt surrounding the town (see Figure 5.4, above).

### **Box 5.5: SANG capacity at Hemel Hempstead**

Hemel Hempstead is the best positioned of Dacorum's settlements in respect of SANG capacity (to mitigate recreational pressure on the Ashridge Commons and Woods SSSI component of the Chilterns Beechwoods SAC, in line with the adopted Mitigation Strategy, as discussed above).

This is on the assumption that Hemel Garden Communities (HGC) programme comes forward in full. The [draft HGC SANG Strategy](#) identifies 277ha of SANG, which compares to a requirement for 211 ha assuming HGC delivers 11,000 homes. Furthermore, SANG capacity could potentially be higher (and the requirement for SANG lower) if further work finds a need to protect the Gade Valley from development. As such, HGC has the potential to deliver new strategic SANG with spare capacity to support housing growth elsewhere locally.

New SANG at HGC clearly has the potential to be high quality and would be broadly well positioned between centres of population and Ashridge. This is particularly the case once account is taken of the potential for HGC SANG to link to Gadebridge Park (a candidate SANG), which is located either side of the A4146, to the north of the town centre. Links would be strongest if a parcel of land located directly to the east of Gadebridge Park was also to come forward as SANG, which is an option for consideration through the Local Plan.

There is also a need to consider Strategic SANG capacity to accommodate the permitted 1,100 home West of Hemel site, which is clearly well-linked to Ashridge and was permitted prior to the Mitigation Strategy. Bespoke SANG options are currently being explored, and a decision on a preferred SANG solution is anticipated soon.

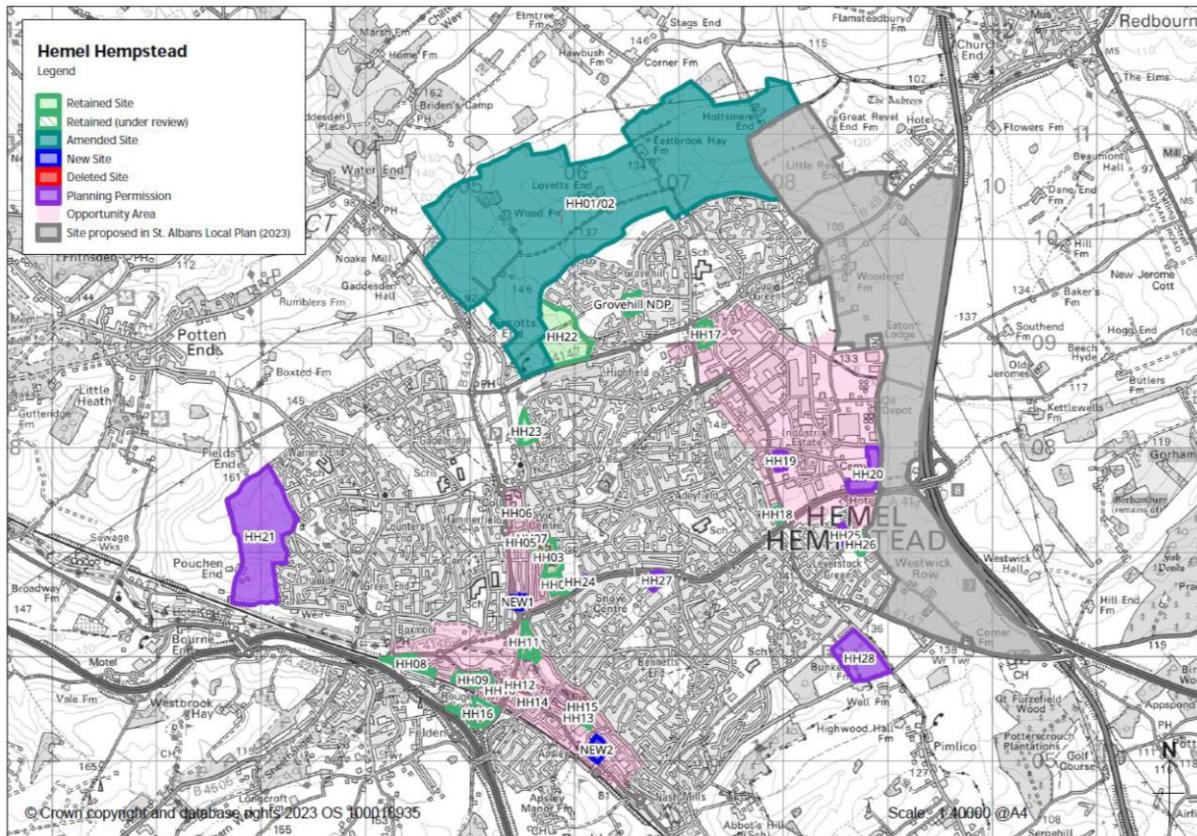
With regards to potential future SANG capacity, Hemel Hempstead also benefits from close association with the Box Moor Trust, which manages over 200 ha of land as accessible open space at the south west edge of the town along the Bulbourne River / canal corridor. As discussed [here](#), the Trust plans to create a new SANG at Westbrook Hay, which is an area within its landholding that is already accessible, but where there is the potential for significant enhancement to reach the levels of accessibility and visitor attractiveness required of a SANG.

There may also be other locations around the edge of the town with potential to boost SANG capacity in the future, but this is uncertain. Attention focuses on existing open spaces in the ownership of Dacorum Borough Council in the town, and there could also feasibly be the potential to increase the capacity of Hemel's one existing SANG at Bunker Park, which is located on raised ground to the south east of the town (Dacorum's only other existing SANG is located at Chipperfield Common on the southern edge of the Borough).

- 5.4.12 After having accounted for supply from permissions (1,983 homes), windfall (2,167 homes), the Grove Hill Neighbourhood Plan (estimated by officers to deliver around 200 homes) and two existing greenfield allocations (total of 472 homes), the first port of call in terms of 'new supply' is **two urban allocations** (Cupid Green Depot, 360 homes; Kier Park, 234 homes). One of these sites (Kier Park) benefits from a resolution to grant permission, whilst the other site (Cupid Green Depot) is associated with some delivery uncertainty (given the need to find a replacement depot location) but does not give rise to any concerns in terms of suitability for the proposed quantum of homes. Total supply from these sources is 5,416 homes.
- 5.4.13 The next port of call is then **Hemel Town Centre**. As discussed above (Section 5.3), whilst the Draft Local Plan (2020) proposed 1,250 homes, the current proposal involves delivery of 1,750 homes over the 16 year plan period. This approach reflects the outcomes of detailed work and is considered to be suitably conservative (e.g. noting additional Opportunity Sites identified in the Town Centre Vision, 2023).
- 5.4.14 The next location for consideration is the **Two Waters Opportunity Area (OA)**, which was the focus of a dedicated [consultation](#) in 2022. The Draft Plan (2020) proposed 1,550 homes, but the current emerging preferred option involves 2,000 homes. This would involve brownfield land only. However, there is also the option of a housing scheme on the adjacent greenfield site known as Shendish Manor (Hotel & Golf Course; henceforth 'Shendish Manor') and Fairfields. This site is discussed further below.

- 5.4.15 The next port of call is then **Land South of Green Lane** (80 homes), which is a greenfield site but not Green Belt. The site performs well, relative to sites discussed below, including as it is a 'deliverable' site, namely one that should be able to deliver homes within the key important first five years of the plan period.
- 5.4.16 Total supply from the above non-Green Belt sources (i.e. not including Shendish Manor and Fairfield) is 9,246 homes, hence there is a need to consider supply options involving Green Belt release, recognising the need to identify a total supply of ~17,000 homes if the housing requirement is to be set at LHN, and recognising constraints affecting lower order settlements. Figure 5.5 shows the emerging preferred options at the current time and is a good starting point for considering **Green Belt options**.

**Figure 5.5: Hemel Hempstead permissions, opportunity areas and select site options**



- 5.4.20 The second Green Belt option is then **Shendish Manor and Fairfield**. It is not shown on the map above but comprises land adjacent to the south west of Apsley Station and the Two Waters Opportunity Area at the south west edge of the town. It is mapped as Site 82 in the [SSTP \(2020\)](#).
- 5.4.21 A key argument for growth here relates to the potential to deliver a primary school that might then enable more comprehensive redevelopment within the adjacent Two Waters Opportunity Area (and avoid the need for a new school in an urban setting). It is also important to note that the land in question is adjacent to Apsley Train Station, and paragraph 142 of the NPPF is clear that public transport is a key factor when considering potential locations for Green Belt release. Furthermore, the Green Belt Review (discussed above) serves to highlight some land here as being relatively low sensitivity. However, there are clear road access challenges, this is quite steeply rising land associated with a public footpath linking to Kings Langley, and this is former parkland associated with Shendish Manor (indicative of biodiversity and potentially a degree of heritage constraint). Set out below is a concept masterplan submitted by the site promoter in 2021, which does serve to highlight the access constraints (discussed further in Section 6).
- 5.4.22 In summary, with regards growth quantum, it is assumed that a 500 home greenfield scheme at Shendish Manor would also enable delivery of an additional 250 homes within the Two Waters Opportunity Area. N.B. there is no identified SANG solution, but the adjacent golf course land could be considered.

**Figure 5.6:** Site promoter's concept plan for Shendish Manor and Fairfield (2021)



- 5.4.23 The third option is **expansion to the north west**. Appendix A of the SSTP (2020) shows four site options here (Sites 62, 63, 69 and 78); however, the eastern-most site (Site 69) was discounted as performing poorly, hence Appendix B considers three sites. There is also a parcel of land that has not been submitted as available (west of Berkhamsted Road), but which it is thought could potentially be made available for development, which might then enable a continuous strategic urban extension of ~1,000 homes.
- 5.4.24 There is very little certainty regarding the deliverability of a strategic urban extension of any form, let alone one that aligns with key objectives and achieves a SANG solution (in the absence of new Strategic SANG at nearby HGC). However, there could feasibly be the potential to work with landowners to deliver a comprehensive scheme that delivers a SANG solution and benefits beyond those that would accrue under a scenario whereby the sites come forward in a piecemeal fashion. Ultimately, the need to test “no HGC” scenarios results in a need to give consideration to expansion of Hemel Hempstead in this area.
- 5.4.25 The final strategic urban extension option would involve **expansion to the west** (beyond the committed West of Hemel site). See Site 80 in the SSTP (2020). However, this option performs poorly, particularly given the importance of avoiding further development creep towards Berkhamsted. The AONB boundary is adjacent to the west, which could assist with containment; however, there is a need to recall the AONB boundary review that is currently underway. The land in question comprises a significant dry valley, with extensive views across the site from historic lanes linking to Potten End to the London Road.
- 5.4.26 The two final sites considered within the Site Selection Topic Paper are **smaller sites** that would deliver little beyond new housing. Firstly, Land South of Link Road/West of Fletcher Way (Site 72) is suited to delivery of green infrastructure / SANG, such that it will continue to function as a landscape gap between the Hemel Hempstead (Old Town) and Piccots End Conservations Areas. Secondly, Red Lion Lane (Site 81) is adjacent to the River Gade / Grand Union Canal corridor and, whilst outside of the fluvial flood zone, the nationally available [dataset](#) shows extensive surface water flood risk across the site (potentially linked to fluvial). The site does warrant further consideration, particularly the part currently used for a car park, but it is not clear that there is potential for a significant housing scheme that warrants further consideration here, particularly once account is taken of arguments for maintaining the Green Belt gap to Kings Langley.
- 5.4.27 Other small sites of note (not considered in Appendix B of the SSTP, 2020) are located along **Chaulden Lane**, but access is poor along here (the permitted West of Hemel Hempstead site will not assist in this respect), and there would be a need to reconfigure existing public open space.
- 5.4.28 In **conclusion**, there are judged to be three reasonable growth scenarios for Hemel Hempstead:
- 1) Non-Green Belt supply plus strategic growth to the NW and Shendish Manor / Fairfields = 10,996 homes
  - 2) Non-Green Belt supply plus HGC = 11,746 homes
  - 3) Scenario 2 plus Shendish Manor / Fairfields = 12,496 homes
- 5.4.29 Final points to note regarding reasonable growth scenarios are:
- A scenario involving ‘Scenario 2 plus strategic growth to the north west’ is judged to be unreasonable because there would be a clear delivery concern given the proximity of growth locations.
  - A scenario involving allocation of just one out of the two Green Belt sites that feature in Scenario 1 would deliver insufficient growth (leading to problematic pressure for growth elsewhere).

## Berkhamsted

- 5.4.30 Berkhamsted, including Northchurch, is the second largest settlement in the Borough. The settlement as a whole has very good transport links, being served by mainline railway services and given the A41 bypass, which links the town to Hemel Hempstead, Aylesbury and the M25.
- 5.4.31 There is also a thriving town centre (although traffic along the high street is an issue) and there are significant employment areas located along the river / canal corridor. The Northchurch area has its own historic core and there is a small local centre that provides for day-to-day needs.
- 5.4.32 However, there are extensive landscape, historic environment and road infrastructure / traffic constraints. These reflect Berkhamsted’s inherent characteristics as a market town strongly associated with the Bulbourne Valley, which is a historic transport route (the London Road and Grand Union Canal) through the Chilterns. Berkhamsted Castle was one of the most important early Norman castles (discussed [here](#)).

**Box 5.6: SANG capacity at Berkhamsted**

Berkhamsted is very closely associated with Ashridge, with many choosing to walk or cycle to Ashridge from or via Berkhamsted (e.g. the map of walking routes [here](#)). It should also be noted that a range of background information Ashridge is presented within a Topic Paper from 2020, for example this [map](#) which aids orientation.

There are currently no SANGs at Berkhamsted; however, one of the strategic urban extension options discussed below (South of Berkhamsted) has confirmed the potential to deliver a bespoke SANG.

There are no clear options for a new strategic SANG on the edge of Berkhamsted, but options will likely be identified in time. Attention potentially focuses on the river / canal corridor, but there is a need to consider that SANGs must deliver genuine circular walks (at least 2.3-2.5km in length) as opposed to linear walks.

It is also noted that the eastern part of Berkhamsted would fall within the catchment of a new Strategic SANG at Box Moor (discussed above).<sup>8</sup> However, the SANG would be in the opposite direction to Ashridge.

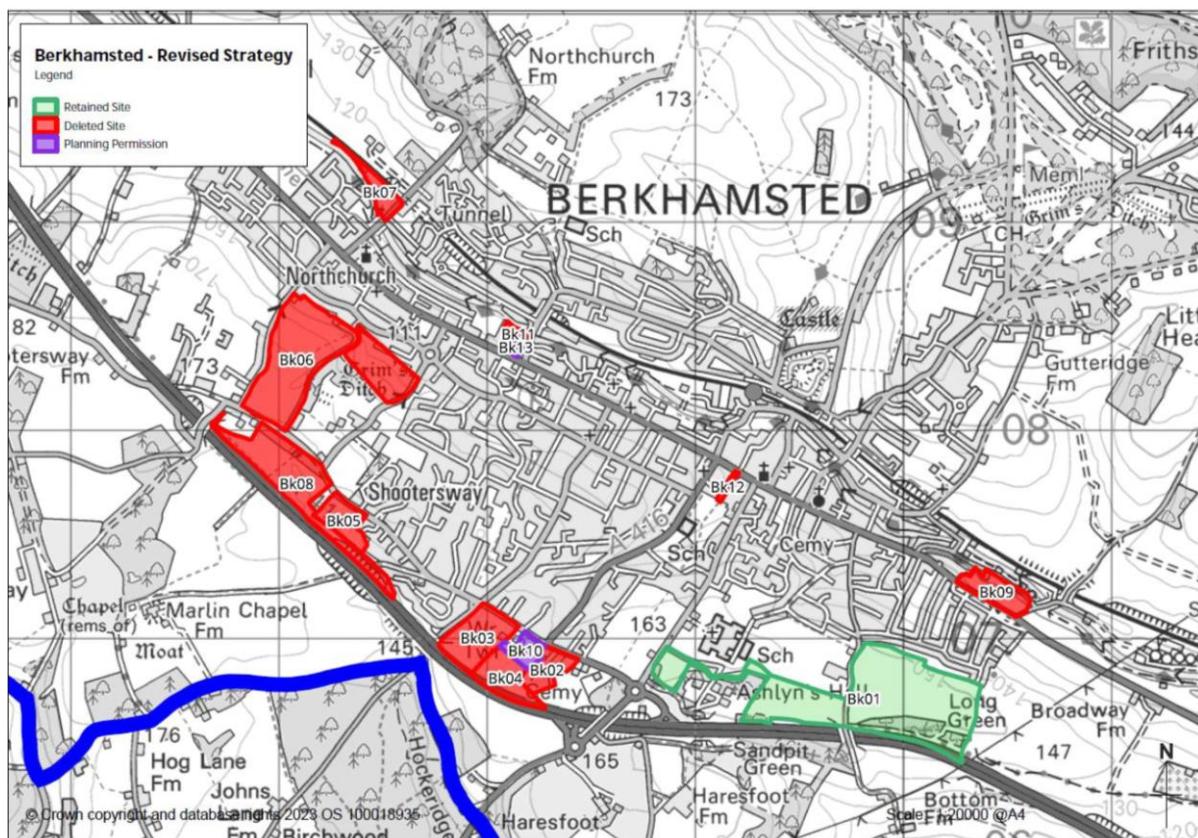
Finally, there is the possibility of a ‘gateway site’ between Berkhamsted and Ashridge. The Mitigation Strategy (2022) explains gateways sites as: “... an innovative and emerging concept... A key difference between SANG and a gateway site is that the latter needs to be well related to the existing Ashridge Estate... A gateway site should provide equivalent attractions and facilities sufficient to draw people away from more sensitive areas within Ashridge Estate... An example of this would be the honeypot location of Monument Drive...”

The Mitigation Strategy explains that gateway sites are “a medium-term project, which will be worked upon once SANG and SAMMS are secured”. However, steps are now being taken, with the National Trust currently running a [consultation](#) on a vision for a series of visitor hubs. This is a long term project at an early stage, with no clear understanding of theoretical capacity to support growth, but this could be a significant factor in the future.

- 5.4.33 The Draft Local Plan (2020) proposed a high growth strategy, which then generated significant objection through the consultation, including relating to transport/traffic. A Sustainable Transport Study (2020) did propose a package of [transport infrastructure interventions](#) to support the proposed level of growth; however, there is a need to recognise the inherent constraints affecting the town.
- 5.4.34 Permissions and windfall total just 414 homes and there are no urban allocation options now proposed. The Draft Plan (2020) proposed allocation of four urban sites, but two of these now have permission, whilst the other two could come forward without an allocation and do not have an identified SANG solution.
- 5.4.35 Figure 5.7 is a good starting point for considering **Green Belt options**. It shows the emerging preferred options at the current time, as well as several other sites previously proposed for allocation in 2020.
- 5.4.36 The strongest performing option is considered to be **South Berkhamsted** given the potential to deliver a strategic scale scheme with new infrastructure alongside housing and a bespoke SANG. The site is also in reasonable proximity to the town centre and the London Road (along which there is a frequent bus service to Aylesbury and Hemel Hempstead), and benefits from being adjacent to a secondary school. Land here is also subject to relatively low Green Belt sensitivity (Figure 5.4). The proposal in 2020 was for 850 homes, and proposals are broadly unchanged at the current time.
- 5.4.37 The second urban extension option is then **Kingshill Way cluster**. A cluster of four adjacent sites was proposed for allocation at the Draft Plan stage. However, one of the sites (which is central in the cluster) is currently under construction for an extra care facility, leaving three sites, with capacity for ~310 homes. Land here is less sensitive in Green Belt terms and in certain environmental respects than is the case for SE Berkhamsted (although noise and air pollution from the A41 is potentially a greater constraint here). However, there is no identified SANG solution, and there is little or no potential to deliver a coordinated strategic-scale scheme, to include significant infrastructure benefits, e.g. a new primary school. This is because the three sites are all in different land ownerships, and the two that would need to come forward first (because they are adjacent to the access road) are associated with delivery issues. Specifically, the eastern-most site is currently occupied by the BFI National Film Archives (it is a developed site within the Green Belt) and the timetable for the site being made available is unclear; whilst the western-most site currently comprises playing fields for Berkhamsted School (the potential for a replacement facility to the south of the A41 has been identified, at Haresfoot Campus, but the timetable is uncertain).

<sup>8</sup> The Mitigation Strategy explains that: SANG of 2-12ha will have a catchment of 2km; SANG of 12-20ha will have a catchment of 4km; and SANG of 20ha+ will have a catchment of 5km.

**Figure 5.7: Berkhamsted permissions and select site options**



5.4.38 Next there is a need to consider:

- Two small sites to the west and east, namely Land adj. to **Blegberry Gardens** (Bk05; 80 homes) and **Bank Mill Lane** (BK09; 50 homes). There are limited environmental sensitivities, other than the lack of a SANG solution (also, Blegberry Gardens is not very well-located in transport terms); however, these sites would deliver little or nothing of strategic benefit beyond new homes.
- The option of a strategic urban extension to the west, comprising **East of Darrs Lane** (Site Bk06) potentially in combination with **Rossway Farm** (Site Bk08). Land here is in control of housebuilders and so potentially deliverable ((i.e. able to deliver in the first five years of the plan period). However, there are sensitivities associated with growth in this area, including given: the adjacent AONB; onsite and adjacent historic environment / archaeology constraint, and inherent road infrastructure and accessibility constraints (including recognising the traffic generated by recent new housing; also noting a recently revoked AQMA at Northchurch). Also, there is currently no commitment to delivering a school, despite there being a clear strategic argument for a new school alongside any housing growth here.

5.4.39 The final Green Belt Option shown on the figure above is **Lock Field, Northchurch** (Site Bk07), which is judged to perform relatively poorly, particularly given proximity to Ashridge. Also, the site is adjacent to the canal and access to Northchurch / Berkhamsted would be via a narrow bridge.

5.4.40 The remaining two site options discussed in Appendix B of the [SSTP \(2020\)](#) are those that were *not* previously proposed for allocation at the Draft Plan stage (2020), and it remains the case that they are judged to perform relatively poorly at the current time. Firstly, **Land East of Berkhamsted** clearly performs poorly in Green Belt and landscape terms, including given extensive views across the Gade valley from the AONB to the north. Secondly, **Ivy House Lane and Grovefield** is well-contained in Green Belt terms, but the AONB is adjacent and the site would be accessed from a rural lane strongly associated with the AONB and views across the Gade Valley. Also, Ashridge is in relative proximity.

5.4.41 Finally, there is a need to consider one small Green Belt site submitted for consideration subsequent to preparation of the SSTP (2020), namely **Land to the north of Byways and south of Castle Village**. The site performs relatively poorly as an option for housing growth, given a location on the periphery of the town, but is being promoted for older persons accommodation. It could be considered for this use, noting that it is adjacent to a larger retirement village (Castle Village), but is not considered further here.

- 5.4.42 In **conclusion**, there are judged to be three reasonable growth scenarios for Berkhamsted:
- 1) Non-Green Belt supply plus Kingshill Way cluster plus 'small sites to the west and east' = 854 homes
  - 2) Non-Green Belt supply plus South Berkhamsted = 1,264 homes
  - 3) Scenario 1 plus Scenario 2 = 1,704 homes
- 5.4.43 These scenarios reflect a pragmatic assumption that 'Kingshill Way cluster' and 'small sites to the west and east' would be delivered in combination. However, in practice, it is recognised that each of the component sites could be delivered in isolation or in any combination. With regards to scenarios involving a strategic urban extension to the west these are ruled out on balance. Kingshill Way cluster is the preferable option, including as it would involve fewer homes and growth at Berkhamsted over-and-above growth at South Berkhamsted would lead to challenges in terms of SANG capacity and school capacity.

## Tring

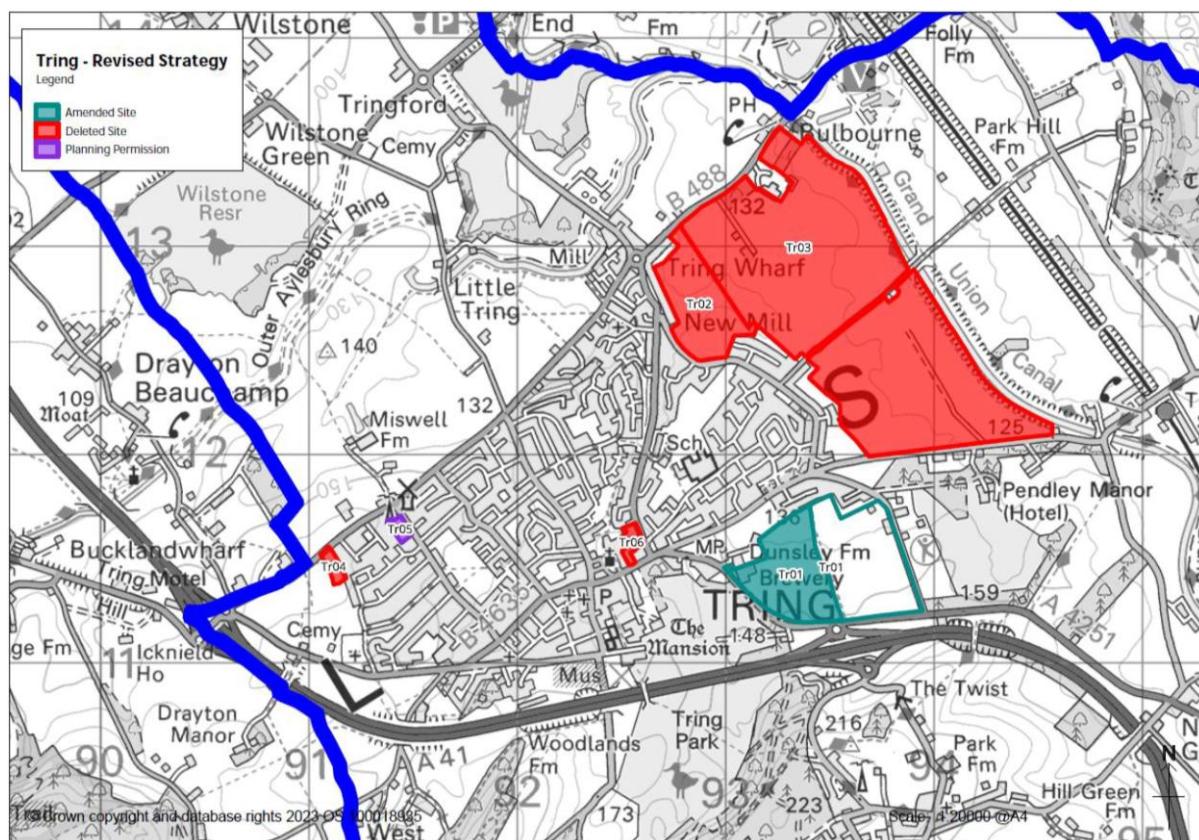
- 5.4.44 Tring is located on the A41 between Berkhamsted to the east and Aylesbury to the west. The town is surrounded by the Chilterns AONB and is set within the Tring Gap foothills, between the low-lying Aylesbury Vale and the north-west face of the Chiltern escarpment. The escarpment is associated with Tring Park Registered Park and Garden (also a SSSI woodland), and the vale landscape north of Tring is associated with a junction on Grand Union (Aylesbury and Wendover Arms) and Tring Reservoirs SSSI.
- 5.4.45 The town is smaller than Berkhamsted and not as well-connected in transport terms, including as the train station is located to the east of the town, along the Grand Union Canal corridor. However, there is a thriving town centre and local employment, including at a scattering of small industrial estates.

**Box 5.7: SANG capacity at Tring**

Tring is similarly linked to Ashridge as is the case for Berkhamsted, including as the direct access route is via the attractive village of Aldbury. However, Tring does also have excellent access to other popular countryside destinations, namely Tring Park to the south, Wendover Woods to the west and Tring Reservoirs to the north. The town is not within the catchment of any existing strategic SANG. However, one of the strategic urban extension options discussed below (Land East of Tring) has confirmed the potential to deliver a bespoke SANG, and there is also likely to be a SANG solution for a second of the options discussed below (Dunsley Farm). There are no clear options for a new strategic SANG on the edge of Tring, but options will likely be identified in time. There is a considerable amount of public sector owned land adjacent to the north of Tring and a Strategic SANG here would link well to the canal(s) and Tring Reservoirs to the north.

- 5.4.46 A 226 home extension is nearing completion to the west, but permissions and windfall total just 272 homes and there are no urban allocation options. The Draft Plan (2020) proposed the allocation of two urban sites, but one now has permission whilst the other is the subject of a planning application for a Lidl store.
- 5.4.47 Figure 5.8 is a good starting point for considering **Green Belt options**. It shows the emerging preferred options at the current time, as well as two other sites previously proposed for allocation in 2020.
- 5.4.48 The strongest performing option is considered to be **Dunsley Farm** (Site Tr01), which relates well to the town centre and the strategic road network. The proposal in 2020 was for 400 homes, but the latest proposal is to develop only the western part of the site for 250 homes, with the eastern part of the site enhanced as accessible green infrastructure; potentially a SANG. The eastern part of the site comprises a Local Wildlife Site (LWS), particularly reflecting hedgerows that support valued butterfly populations. The potential of developing the site as a whole (along with extensive green infrastructure) does remain an option, recognising that: A) the LWS designation is perhaps marginal or, at least, the LWS is not as highly valued as others in the Borough that comprise woodland, heathland or unimproved grassland; and B) the site as a whole is well-contained in Green Belt terms (in the Tring context), given an assumption that Cow Lane and the remnant parkland landscape to the east could form a defensible new Green Belt boundary. However, on balance, there is judged to be a clear preference for a 250 home scheme. As well as SANG capacity and the need to assign weight to the LWS constraint, there are limited drawbacks to a reduced scheme in terms of delivering benefits to the local community beyond new homes. Specifically, as per the 400 home scheme proposed at the Draft Plan stage, a 250 homes scheme would still deliver land for a new primary school and also deliver a new business hub (an expansion to the Tring Brewery site).

**Figure 5.8: Tring permissions and select site options**



- 5.4.49 The second option for consideration is **New Mill** (Site Tr02), which was previously proposed for 400 homes, albeit this was in the context of additional growth adjacent to the east (Land East of Tring, discussed below). The site is quite well contained in Green Belt terms, with existing built form almost extending to three of its four sides; however, unlike Dunsley Farm, the site has not been promoted for significant non-housing uses, and there is no identified SANG solution. The site could potentially be delivered in combination with Land East of Tring; however, the current planning application for Land East of Tring (see below) excludes this land. If this site were to come forward in isolation then it could be suited to a reduced quantum of new homes, with a view to securing a defensible new Green Belt boundary.
- 5.4.50 The third option is **Land East of Tring** (Tr03), which was previously proposed for 1,400 homes, and the aim was to deliver the site in combination with New Mill to form a 1,800 home strategic urban extension. The site could deliver a bespoke SANG, and there are clearly benefits to delivering strategic growth (as discussed), but the site is subject to wide-ranging sensitivities, including in terms of Green Belt (Figure 5.4) and landscape (adjacent AONB). There is a planning application for 1,400 homes, which is currently the subject of an appeal, following refusal of the scheme by DBC in October 2022 (ref. [22/01187/MOA](#)).
- 5.4.51 The one remaining shortlisted site option discussed in Appendix B of the [SSTP \(2020\)](#) was not proposed for allocation in the Draft Plan stage (2020) and so is not shown on the map above. Specifically, **Land South of Gammel Farm, Bulbourne Road** is a small site located to the north of the town. It is not well-located in accessibility terms and the AONB is adjacent. However, it is otherwise subject to limited constraint (assuming that the AONB designation would provide containment to the east). As a small site (~39 homes) it is not considered further here, but it might warrant further consideration moving forward. It could perform better in accessibility terms if brought forward in combination with Land East of Tring.
- 5.4.52 Finally, there is a need to consider the option of strategic expansion to the **north of Tring** (north of the B488 Icknield Way, east of Little Tring Road). One option was discounted within Appendix A of the [SSTP \(2020\)](#), and then adjacent land was subsequently submitted for consideration. There would be a clear need to take a strategic approach to any expansion of Tring in this area, given AONB and Green Belt sensitivities, and with a view to a SANG solution (potentially a Strategic SANG, as discussed above). No such proposals for a comprehensive strategic urban extension have been submitted, unlike Land East of Tring, which also benefits from relative proximity to the train station. It is also noted that the high level nationally available dataset shows some grade 2 quality agricultural land to the north and east of Tring.

5.4.53 In **conclusion**, there are judged to be three reasonable growth scenarios for Tring:

- 1) Non-Green Belt supply plus Dunsley Farm (250 homes) = 522 homes
- 2) Scenario 1 plus New Mill = 922 homes
- 3) Scenario 2 plus Land East of Tring = 2,322 homes

5.4.54 Finally, points to note are:

- Dunsley Farm performs well to the extent that it can be held constant. This decision is taken in light of the strategic context (Section 5.2), particularly a clear argument for significant housing growth at Tring.
- With regards to scenarios involving allocation of Dunsley Farm in full, for 400 homes or more (recognising that the entire land parcel is in excess of 30 ha), scenarios along these lines are ruled out on balance, but could potentially be reconsidered ahead of plan finalisation.
- Finally, Land South of Gammel Farm, Bulbourne Road may warrant further consideration, but as a small site does not warrant being taken forward to the reasonable alternative growth scenarios.

## Kings Langley

5.4.55 Kings Langley is the largest of the three Large Villages discussed here, and it should be noted that a recent South West Herts settlement hierarchy [study](#) placed Kings Langley in a tier above both Bovingdon and Markyate. The village benefits from a secondary school and very good public transport and road connectivity, with Hemel Hempstead and Watford in close proximity to the north and south respectively. The village is strongly associated with the River Gade / Grand Union Canal corridor and has a vibrant centre characterised by historic listed buildings and a good provision of local shops and services.

5.4.56 Kings Langley straddles the borough boundary, which runs along the Grand Union Canal, with the part of the village to the east of the Canal being within Three Rivers District. This is an important relationship as the area contains a mix of office and industrial premises at Home Park, Station Road and Primrose Hill, and the higher education facility of West Herts College (Kings Langley Campus).

### **Box 5.8: SANG capacity at Kings Langley**

Kings Langley is relatively distant from Ashridge; however, regardless, it is within the 12.6km zone of influence, as per all settlements within Dacorum. The village is also well located in terms of accessing the Borough's two existing SANGs – Bunkers Park and Chipperfield Common – however, capacity at these SANGs is an issue and principally reserved for smaller scale / windfall developments. Any new strategic SANG at Box Moor could also be well located for Kings Langley, but there is no certainty regarding a Strategic SANG here nor that capacity would be made available to support Kings Langley growth (again, strategic SANG is primarily for small sites).

5.4.57 There has been very limited recent housing growth, albeit local housing need concerns are partly allayed by the proximity of Kings Langley to Hemel Hempstead and Watford. It is also important to note that Three Rivers District is associated with a strong likelihood of significant unmet housing need (see Box 5.1). Finally, it is noted that Kings Langley benefits from its own Neighbourhood Plan (January 2023).

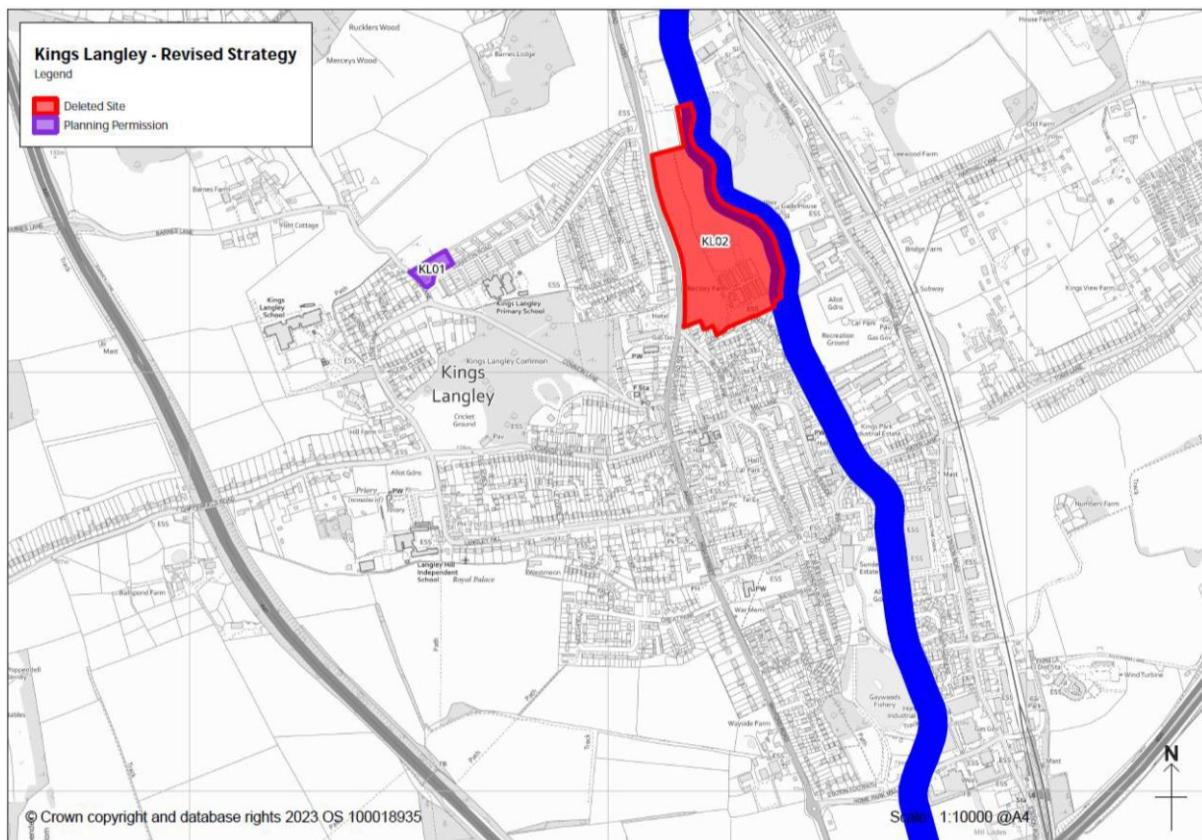
5.4.58 Permissions and windfall total 68 homes and there are no urban allocation options. The Draft Local Plan (2020) proposed the allocation of one urban site (10 homes), but that site has now built-out.

5.4.59 Figure 5.9 is a good starting point for considering **Green Belt options**. It shows the one Green Belt site previously proposed for allocation in 2020, along with the aforementioned permitted urban site.

5.4.60 The Green Belt site previously proposed for allocation at the Draft Plan stage (2020) is known as **Land at Rectory Farm**. It was proposed for 145 homes in the plan and is currently the subject of an undetermined planning application for 135 homes (ref. [22/01836/MFA](#)). One key point to note is that the site falls within a parcel of land identified as contributing strongly to Green Belt purposes (see Figure 5.4); however, it is recognised that this is a detailed matter being explored through the application process. The view of DBC officers (in discussion with AECOM), is that a final decision on how to treat this site should be made after work has been completed in respect of the current application. See further discussion in Section 5.5.

5.4.61 Three further site options were shortlisted in 2020, such that they are shown in green on the Kings Langley map in Appendix A of the [SSTP](#) (2020) and assessed within a proforma in Appendix B. These sites are discussed in turn below.

**Figure 5.9: Kings Langley permissions and select site options**



- 5.4.62 Firstly, there are two small / modest sized sites to the north / north west of the village. The larger of the two sites is located to the north west, between the village and the A41, and benefits from a location adjacent to the secondary school as well as a degree of capacity in Green Belt terms (see Figure 5.4). However, road access is a constraint and traffic would pass through the Kings Langley Conservation Area.
- 5.4.63 With regards to the smaller of the two sites, this is located adjacent to the north east of the permitted site shown on the map above. A concern is erosion of the Green Belt gap to Hemel Hempstead, although it is recognised that there is a historic field boundary that could provide containment. Both the primary school and secondary school are nearby, but landscape is potentially a constraint. Specifically, the land comprises a shallow valley that descends down to the Gade valley to the east; however, on the other hand, it is not clear that there are sensitive views across this land (e.g. from historic Barnes Lane and the public footpath associated with high ground to the west). Another consideration is potentially traffic along Common Lane, which passes through the centre of the historic Kings Langley Common.
- 5.4.64 The final shortlisted site from 2020 is a very large site comprising land between the south west edge of the village and the A41. However, latest understanding is that this land, which is owned by the County Council, is no longer available for development. The scale of the site could feasibly lead to significant opportunities (e.g. in respect of delivering a bespoke SANG), there is a degree of capacity in Green Belt terms, the train station is nearby and there is a need to recall the likelihood of significant unmet housing need from nearby Three Rivers District. However, it is understood that traffic on the approach to the nearby M25 / A41 / A4251 junction is a significant constraint to growth in this area. Also, there are landscape and historic environment constraints, including given the Hertfordshire Way long distance path.
- 5.4.65 In **conclusion**, there is judged to be only one reasonable growth scenario for Kings Langley:
- 1) Non-Green Belt supply for 68 homes (also possible additional supply from Land at Rectory Farm)
- 5.4.66 With regards to the two small / modest sized sites to the north, these could warrant further consideration, but there is no clear SANG solution (and this would particularly be an issue if it transpires that Land at Rectory Farm is permitted) and there is also the context of limited strategic case for growth at Kings Langley relative to the higher order settlements discussed above.

## Bovingdon

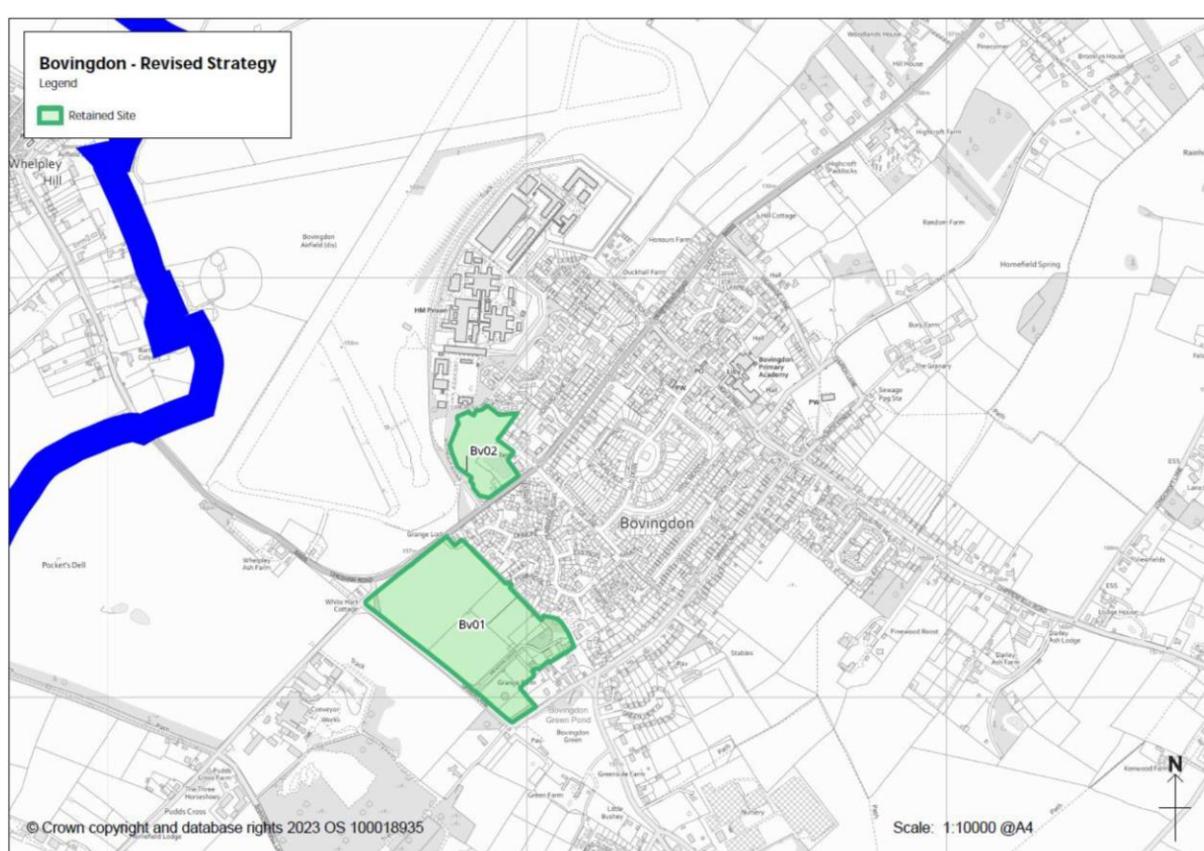
- 5.4.67 This is the second of three third tier settlements for consideration, and strategic factors here include: very limited recent housing growth; a relatively rural settlement, in comparison to Kings Langley, although train stations at Hemel Hempstead and Chesham are potentially within cycling distance (albeit routes are hilly, and the B4505 to Hemel is not likely to be an attractive route); there is no secondary school, but there is significant local employment, most notably at a prison; as per Kings Langley, the village is very well connected to Three Rivers District, from where significant unmet housing needs are likely to arise there.

**Box 5.9: SANG capacity at Bovingdon**

The existing SANG at Chipperfield Common is nearby, but capacity at this SANG is an issue, and should be reserved for smaller sites / windfall. Any new strategic SANG at Box Moor could also be well located for Bovingdon, but there is no certainty regarding a Strategic SANG here nor that capacity would be made available. With regards to bespoke SANG, this is a solution for one of the site options discussed below.

- 5.4.68 Permissions and windfall total 40 homes and, beyond this, there is also the potential to assume 40 homes supply from Molyneaux Avenue, which is an existing allocation (and hence not Green Belt) and is the subject of an undetermined application (ref. 23/0217/MFA).
- 5.4.69 Figure 5.10 is a good starting point for considering **Green Belt options**. It shows the one Green Belt site previously proposed for allocation in 2020, along with the aforementioned existing allocation.

**Figure 5.10: Bovingdon select site options**



- 5.4.70 As per 2020, the strongest performing Green Belt site option is considered to be **Grange Farm**, which is shown on the map above as site Bv01. The site is thought to be 'deliverable', i.e. able to deliver in the first five years of the plan period; and can potentially deliver improvements to the village centre via the relocation of village centre existing uses. Also, and importantly, there is an identified bespoke SANG solution, on the assumption that the scheme comes forward alongside the South Berkhamsted site option discussed above. Specifically, the bespoke SANG associated with that site would deliver spare capacity which would then be made available to support development at Grange Farm, Bovingdon. The SANG would be well-located to deflect Bovingdon-related recreational pressure away from Ashridge.

- 5.4.71 Green Belt sensitivity at Grange Farm is relatively low; however, surface water flood risk is an issue. A current planning application for 186 homes plus a care facility (ref. [23/02034/MFA](#)) does propose drainage measures to address the flood risk, but there is a need to ensure that due space within the site is given over to addressing this issue, potentially with a view to reducing the existing flood risk downstream.
- 5.4.72 At the Draft Plan stage the proposal was to deliver a new primary school onsite; however, that is no longer the proposal (in discussion with the County Council). Nonetheless, it remains the case that 150 homes are supported onsite (as per the Draft Plan stage) in order to ensure space onsite for community and green/blue infrastructure and also being mindful of capacity at the existing village school.
- 5.4.73 Three further site options were shortlisted in 2020, such that they are shown in green on the Bovingdon map in Appendix A of the [SOTP](#) (2020) and assessed within a proforma in Appendix B. Specifically:
- **Duckhall Farm** – is located close to the village centre but is strongly associated with a cluster of four Grade II listed buildings, as well as mature / historic hedgerows. It may warrant further consideration, but likely not for its full identified capacity (72 homes). A much smaller site could be considered.
  - **Fox Meadow** (24 homes) and **Homefield** (112 homes) are two adjacent sites to the east of the village, that could feasibly be considered as an alternative to Grange Farm (on account of involving a similar scale of growth). However, access / road connectivity is an issue, including given existing on-road parking along Green Lane. Also, land here is likely to be more sensitive than Grange Farm in Green Belt terms, and a long distance footpath runs adjacent to the northern-most of the two sites (Homefield). Finally, there is no identified SANG solution.

5.4.74 In conclusion, there is judged to be only one reasonable growth scenario for Bovingdon:

- 1) Non-Green Belt supply for 80 homes plus Grange Farm = 230 homes.

- 5.4.75 With regards to a scenario involving non-allocation of Grange Farm, this warrants further consideration recognising that Bovingdon is a lower order settlement likely to be associated with quite high car dependency. However, the site performs well in a range of respects, would deliver benefits to the village and has an identified SANG solution. It is understood to have support in principle from the Parish Council.

## Markyate

- 5.4.76 This is the final and smallest of the third tier settlements for consideration, and strategic factors here include: some (limited) recent housing growth; a relatively small and rural village, but quite well-connected to Dunstable and Luton by road and bus (also a bridleway to Luton that could be an attractive cycle route in the summer months); a rolling downland landscape, with the AONB adjacent to the west.<sup>9</sup>

### **Box 5.10: SANG capacity at Markyate**

Markyate is relatively distant from Ashridge, and there are alternative attractive countryside such as Dunstable Downs; however, regardless, the village is within the 12.6km zone of influence.

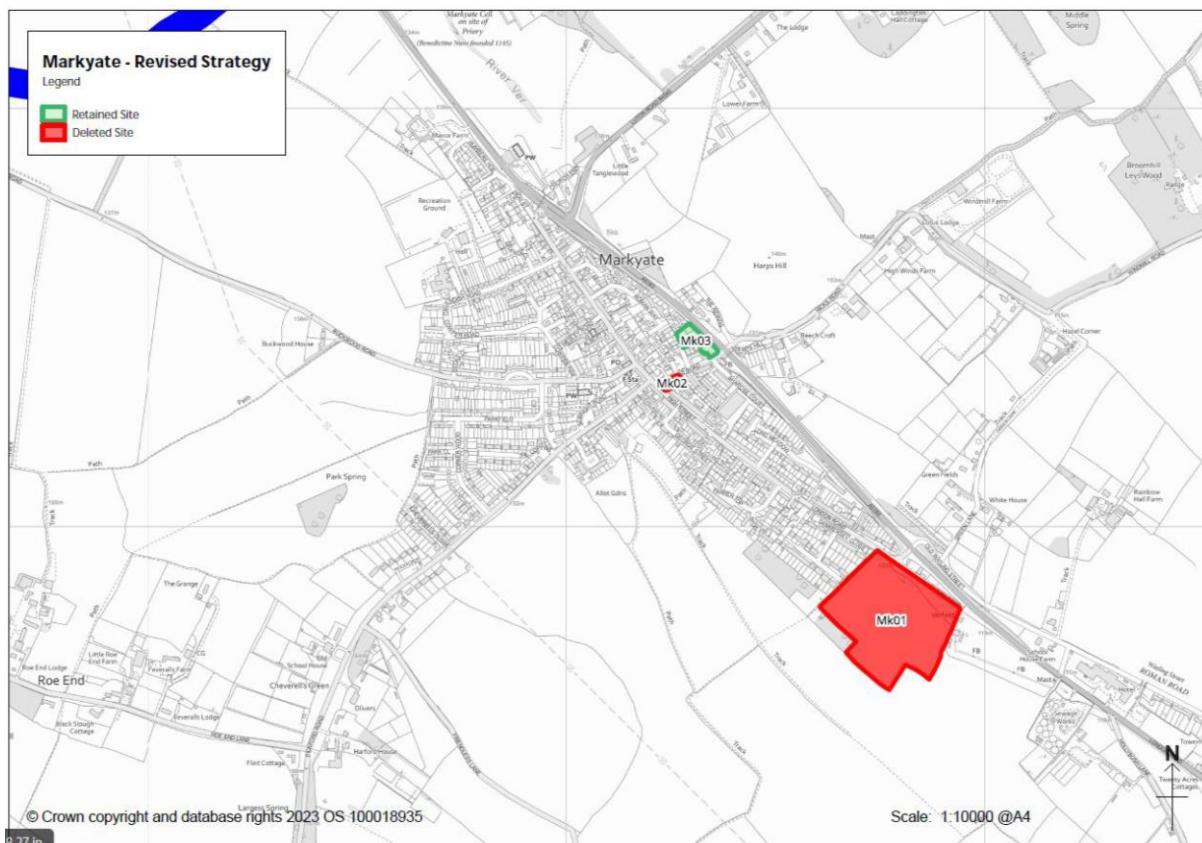
Markyate is well beyond the catchment of the Borough's existing strategic SANGs and would also be just beyond the 5km catchment of any new SANG delivered as part of Hemel Garden Communities. Nor is there any potential to suggest the likelihood of new SANG in the vicinity of Markyate in the future, and the village is also notably located on the opposite side of Ashridge to the likely location of any future gateway site(s).

However, the village is located within the catchment of Studham Common, a SANG located in Central Bedfordshire but on the border with Dacorum Borough Council (further information is available [here](#)). It is understood that some capacity exists at this SANG which could be made available for developments in Markyate, although this would require cross boundary discussion and agreement between the two councils.

- 5.4.77 Permissions and windfall total 33 homes and, beyond this, there is also the potential to assume 20 homes supply from Watling Street (r/o Hicks Road and High Street), which is a proposed brownfield allocation.
- 5.4.78 Figure 5.11 is a good starting point for considering **Green Belt options**. It shows the one Green Belt site previously proposed for allocation in 2020, along with the aforementioned proposed brownfield allocation.

<sup>9</sup> It should be noted that within the previous Interim SA Report (2020; see [Section 5.3](#) of the report) the view was that Bovingdon and Kings Langley are associated with a growth opportunity over-and-above Markyate.

**Figure 5.11: Markyate select site options**



5.4.79 The Green Belt site previously proposed for allocation (150 homes) - **South of London Road** - is now judged to perform poorly relative to Green Belt options discussed above, given the lack of an identified SANG solution, but also accounting for Green Belt, AONB and flood risk sensitivities. Also, the site would likely be associated with high car dependency and deliver few significant benefits beyond new homes.

5.4.80 One further site option was shortlisted in 2020, such that it was shown in green on the Markyate map in Appendix A of the [SSTP \(2020\)](#) and assessed within a proforma in Appendix B. Specifically, the site in question is known as **Cotton Spring Farm**; however, it is judged to perform notably poorly given AONB and other constraints. It would need to come forward as an extension to South of London Road, and it is not clear that a combined scheme would deliver any additional benefits (beyond additional homes).

5.4.81 In conclusion, there is judged to be only one reasonable growth scenario for Markyate:

1) Non-Green Belt supply for 53 homes.

5.4.82 South of London Road does warrant ongoing consideration given the likelihood of locally arising housing needs, but the lack of a SANG solution could well continue to be prohibitive.

## Rest of the Borough

5.4.83 Permissions within the rest of the Borough total 161 homes, plus 305 homes from windfall sites can be assumed. Windfall will comprise of a mix of Green Belt sites (where development can be achieved without impacting on the purposes of the Green Belt, including within those smaller villages 'washed over' by the Green Belt) and non-Green Belt sites, chiefly from small new build, conversions and changes of use.

5.4.84 There are no housing-led site options reasonably in contention for allocation, as discussed in Section 5.3. Also, as discussed in Section 5.3, there are no reasonable new settlement options.

5.4.85 However, the Draft Plan (2020) did propose four employment allocations in the countryside. These are all currently under review, and a final decision on employment land allocations will be made subsequent to the current consultation. See further discussion in Section 5.5.

5.4.86 In conclusion, one scenario is progressed involving permissions and windfall supply for 466 homes.

## Summary

5.4.87 Table 5.1 summarises the sub-area growth scenarios defined on the basis of the analysis presented above (informed by Sections 5.2 and 5.3). Having defined sub-area growth scenarios, the next step (Section 5.5) is to combine them to form a single set of reasonable growth scenarios for the Borough.

5.4.88 Final points to note are as follows:

- Supply from Hemel Hempstead town centre could potentially be significantly higher, but it is not clear that there is a strategic choice to explore through the appraisal of RA growth scenarios. A final decision on an appropriate (conservative) estimate for the number of homes from Hemel town centre will need to be made in respect of the latest technical evidence on land availability, achievability and deliverability.
- At Hemel Hempstead, Berkhamsted and Tring certain growth scenarios are progressed despite the lack of an identified SANG solution. This is considered a reasonable approach to take given that understanding of SANG capacity / solutions can and will evolve over time and given the importance of leaving 'no stone left unturned' at these higher order settlements, in the context of borough-wide LHN.
- At Hemel Hempstead, Berkhamsted and Tring there are scenarios other than those progressed to Section 5.5. that are arguably reasonable, and which might be given further consideration ahead of plan finalisation, but there is a pragmatic need to progress no more than three scenarios for each settlement.
- Kings Langley is associated with a feasible higher growth scenario, but a planning application for the site in question is soon to be decided. Reasonable growth scenarios for Kings Langley will be reconsidered in the future in light of the decision. SANG capacity could prove prohibitive.
- Bovingdon is associated with a feasible lower growth scenario, namely a scenario involving only supply from non-Green Belt sites, but there is a strong argument to suggest that this scenario is unreasonable.

**Table 5.1: Summary of sub-area scenarios**

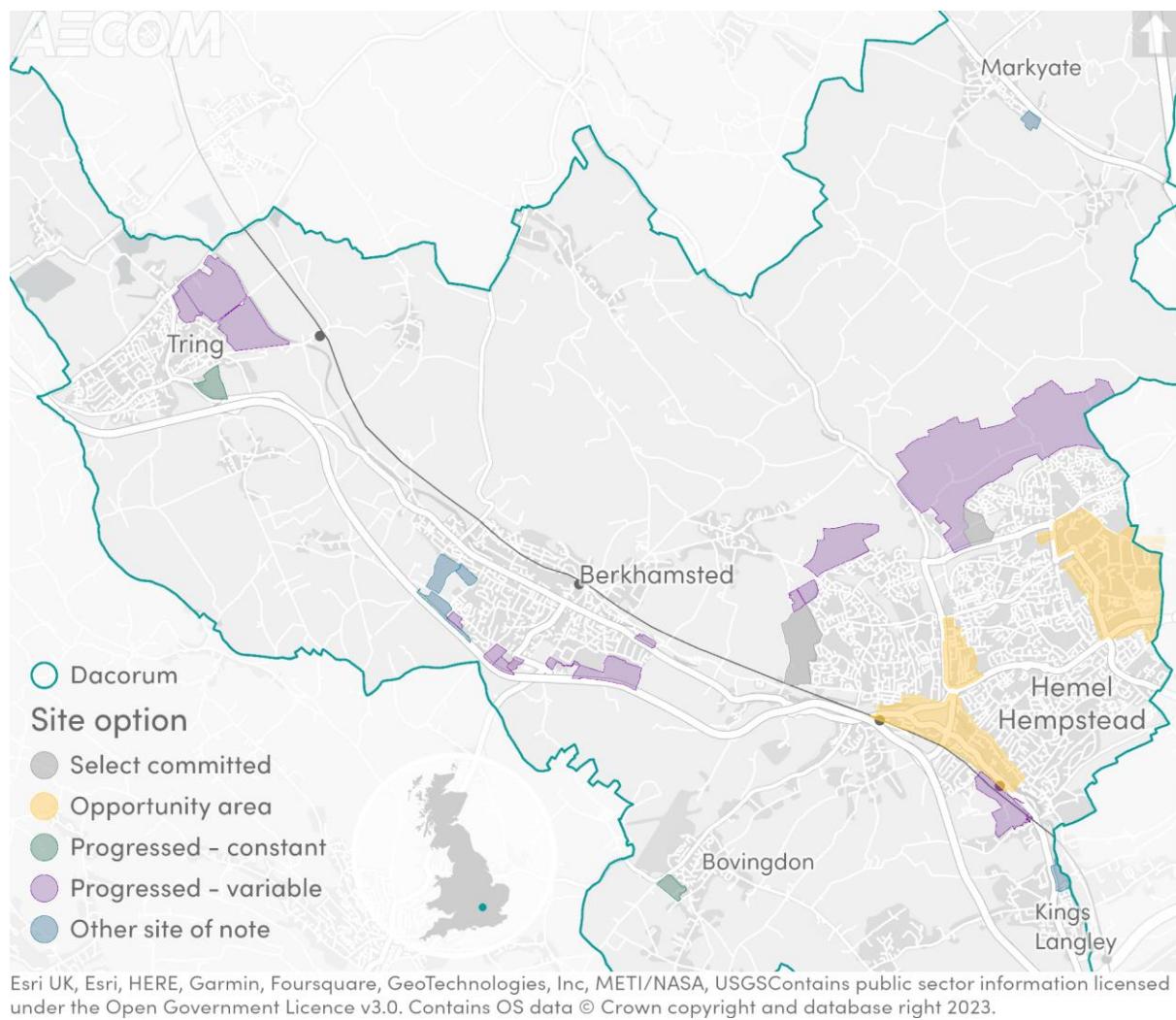
Sub area	Scenarios (Non-Green Belt supply plus...)*	Total homes
Hemel Hempstead	1) NW Hemel + Shendish Manor (+ 250 extra homes at Two Waters OA)	10,996
	2) Hemel Garden Communities (HGC)	11,746
	3) HGC plus Shendish Manor	12,496
Berkhamsted	1) Kingshill Way cluster + two small sites to the west and east	854
	2) South Berkhamsted	1,264
	3) Scenario 1 + Scenario 2	1,704
Tring	1) Dunsley Farm	522
	2) Dunsley Farm + New Mill	922
	3) Scenario 2 + Land east of Tring	2,322
Kings Langley	N/a	68
Bovingdon	Grange Farm	230
Markyate	N/a	53
Elsewhere	N/a	466

\* Non-Green Belt supply will include some windfall development in the Green Belt

5.4.89 Figure 5.12 also aims to summarise the analysis presented under the sub-area headings above. It does not show all site options discussed above, but shows:

- The three Hemel Hempstead Opportunity Areas
- Two key committed sites (Marchmont Farm and West of Hemel)
- Two Green Belt site options progressed as a constant (Dunsley Farm and Grange Farm)
- Seven sites / site combinations progressed as a variable
  - Hemel Garden Communities
  - Shendish Manor / Fairfields
  - North west Hemel Hempstead (cluster)
  - South east Berkhamsted
  - South of Berkhamsted
  - Two small sites at Berkhamsted
  - New Mill and Land east of Tring (two sites)
- Select other notable Green Belt site options
  - West of Berkhamsted
  - Rectory Farm, Kings Langley
  - East of Markyate

**Figure 5.12: Site options status established on the basis of the sub-area analysis**



## 5.5 Reasonable growth scenarios

- 5.5.1 The final step was to **combine sub-area scenarios** to form borough-wide reasonable growth scenarios.
- 5.5.2 It is not possible to reflect all of the possible sub-area combinations across the growth scenarios, hence the following rules were applied in order to arrive at a manageable number of scenarios:
- Total growth quantum – rule-out sub-area combinations / growth scenarios that would involve a total supply of below ~14,000 homes (in the context of an LHN figure of 16,288).<sup>10</sup>
  - Berkhamsted and Tring – focus on the lower and higher growth scenarios, with the *highest* growth scenario only considered if necessary, i.e. in order to achieve higher growth for the Borough as a whole.
- 5.5.3 Applying these rules leads to **12 reasonable growth scenarios**, which are set out below in Tables 5.2 and 5.3 and across 12 maps (N.B. showing only select non-GB sites and permitted sites).
- 5.5.4 An immediate point to note is that the highest growth scenario would enable the housing requirement to be set at LHN (with a supply buffer of 6%), i.e. none of the scenarios would enable the housing requirement to be set at a figure above LHN. Whilst there is a high level strategic argument for considering setting the housing requirement above LHN, as discussed in Section 5.2, the work to consider supply options in Section 5.4 serves to highlight that setting the housing requirement at a figure above LHN is highly challenging in the Dacorum context. It is difficult to envisage reasonable **higher growth scenarios** (Scenario 12, as set out below, comprises a combination of the highest growth scenarios defined for each sub-area in Section 5.4); however, prior to plan finalisation it could be the case that additional supply from Hemel town centre can be identified, plus there could potentially be modest additional Green Belt supply from Kings Langley depending on the outcome of the planning application that is currently pending.
- 5.5.5 Further methodological points to note are as follows:
- 12 scenarios is already more than is ideal, from a perspective of accessibility (to stakeholders and the public). There is clear need to avoid consulting upon more than 12 reasonable growth scenarios.
  - The phrase 'all reasonable alternatives' does not equate to all conceivable alternatives.<sup>11</sup>
  - There will be the potential to appraise higher growth scenarios subsequent to the current consultation, if necessary, also taking into account the latest national policy context, e.g. in respect of the Green Belt.
- 5.5.6 Finally, Box 5.11 considers employment land supply assumptions across the growth scenarios.

### **Box 5.11: Employment land assumptions**

The Draft Plan (2020) proposed the following employment allocations:

- Two Waters Road / A41 Junction (5.6 ha)
- Bovingdon Brickworks (extension) (1.8 ha)
- Upper Bourne End Lane / Stoney Lane (Bourne End Mills GEA Extension) (1.2 ha)

Also the Draft Plan proposed Watling Street Truck stop (16.2 ha).

However, all are currently under review. Employment land allocations will be confirmed subsequent to the current consultation, i.e. prior to Regulation 19 publication.

With regards to the housing-led site options discussed in Section 5.4 and progressed to the reasonable alternative growth scenarios, the first point to make is that Hemel Garden Communities is crucially important from an 'economy and employment' perspective, as has been discussed. Also, Dunsley Farm, Tring, would deliver modest new employment, and there is also a need to consider the existing employment site at the South Berkhamsted cluster. Finally, a number of the Hemel Hempstead urban sites that are held constant across the reasonable alternative growth scenarios would deliver new employment floorspace.

<sup>10</sup> On the basis of this rule the lowest growth scenario for Hemel Hempstead only features in only one of the borough-wide growth scenarios, namely a scenario where the highest growth scenario is assumed at both Berkhamsted and Tring.

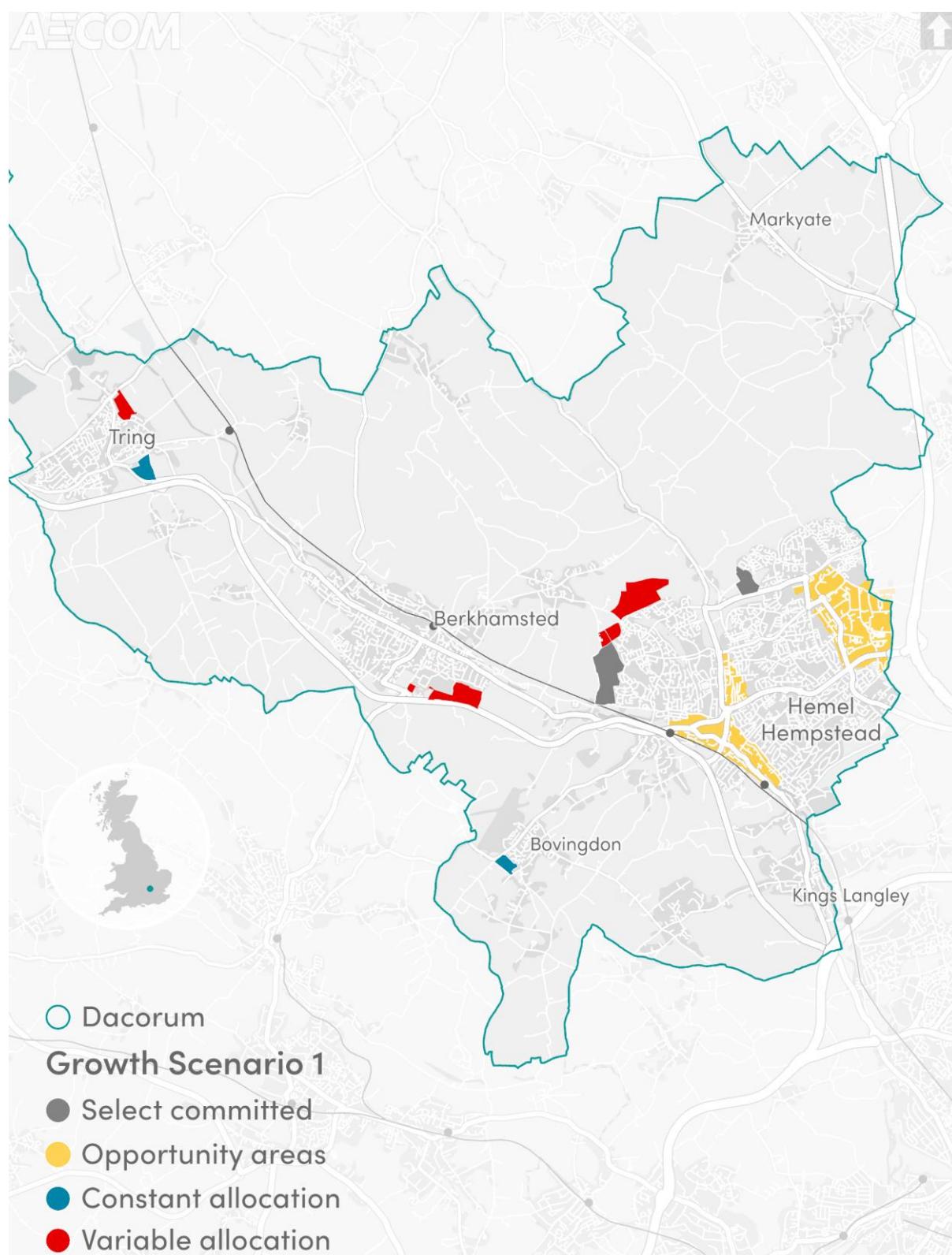
<sup>11</sup> This is a quote from an Inspectors Report, see [www.aylesburyvaluedc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf](http://www.aylesburyvaluedc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf)

**Table 5.2:** The reasonable alternative growth scenarios with supply broken down only by settlement only

Supply component	1	2	3	4	5	6	7	8	9	10	11	12
Hemel Hempstead	10,996	11,746	11,746	11,746	11,746	12,496	12,496	12,496	12,496	12,496	12,496	12,496
Berkhamsted	1,264	854	854	1,264	1,264	854	854	1,264	1,264	1,704	854	1,704
Tring	922	522	922	522	922	522	922	522	922	522	2322	2322
Kings Langley	68	68	68	68	68	68	68	68	68	68	68	68
Bovingdon	230	230	230	230	230	230	230	230	230	230	230	230
Markyate	53	53	53	53	53	53	53	53	53	53	53	53
Countryside	466	466	466	466	466	466	466	466	466	466	466	466
<b>Total supply</b>	<b>13,994</b>	<b>13,934</b>	<b>14,334</b>	<b>14,344</b>	<b>14,744</b>	<b>14,684</b>	<b>15,084</b>	<b>15,094</b>	<b>15,494</b>	<b>15,534</b>	<b>16,484</b>	<b>17,334</b>

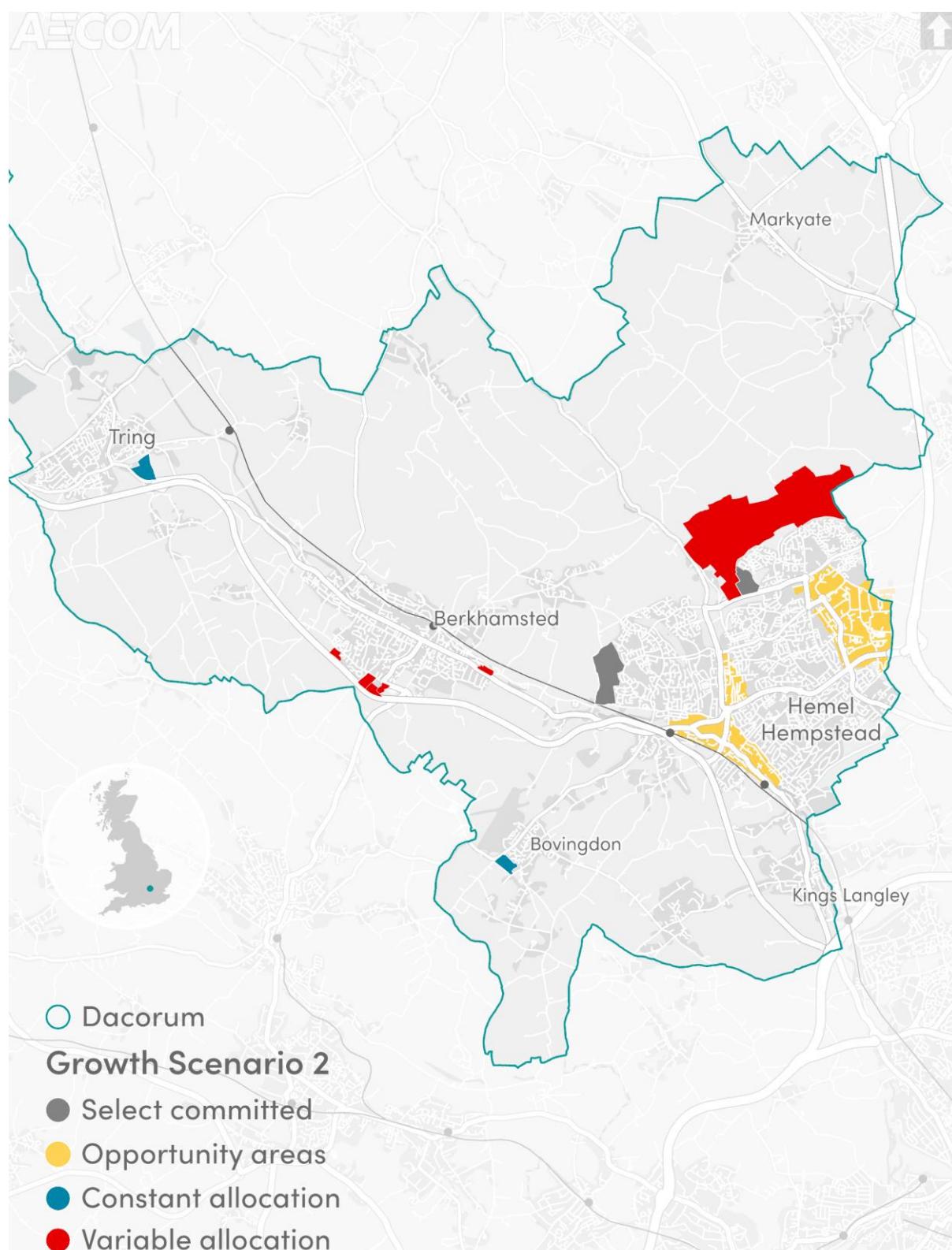
**Table 5.3:** The reasonable alternative growth scenarios with supply broken down further

Supply component	1	2	3	4	5	6	7	8	9	10	11	12
Permissions	2390	2390	2390	2390	2390	2390	2390	2390	2390	2390	2390	2390
Windfall	3053	3053	3053	3053	3053	3053	3053	3053	3053	3053	3053	3053
Allocations	Existing allocations	732	732	732	732	732	732	732	732	732	732	732
	Urban allocations	590	590	590	590	590	590	590	590	590	590	590
	Greenfield allocation	80	80	80	80	80	80	80	80	80	80	80
	Hemel Town Centre OA	1750	1750	1750	1750	1750	1750	1750	1750	1750	1750	1750
	Hemel Two Waters OA	2000	2000	2000	2000	2000	2250	2250	2250	2250	2250	2250
Allocations	Hemel Hempstead	1500	2500	2500	2500	2500	3000	3000	3000	3000	3000	3000
	Berkhamsted	850	440	440	850	850	440	440	850	850	1290	440
	Tring	650	250	650	250	650	250	650	250	650	250	2050
	Bovingdon	150	150	150	150	150	150	150	150	150	150	150
	Kings Langley	0	0	0	0	0	0	0	0	0	0	0
	Markyate	0	0	0	0	0	0	0	0	0	0	0
<b>Total supply</b>	<b>13,994</b>	<b>13,934</b>	<b>14,334</b>	<b>14,344</b>	<b>14,744</b>	<b>14,684</b>	<b>15,084</b>	<b>15,094</b>	<b>15,494</b>	<b>15,534</b>	<b>16,484</b>	<b>17,334</b>
<b>% above/below LHN (16,288 homes)</b>	<b>-14%</b>	<b>-14%</b>	<b>-12%</b>	<b>-12%</b>	<b>-9%</b>	<b>-10%</b>	<b>-7%</b>	<b>-7%</b>	<b>-5%</b>	<b>-5%</b>	<b>1%</b>	<b>6%</b>

**Growth scenario 1: Higher growth at Berkhamsted and Tring**

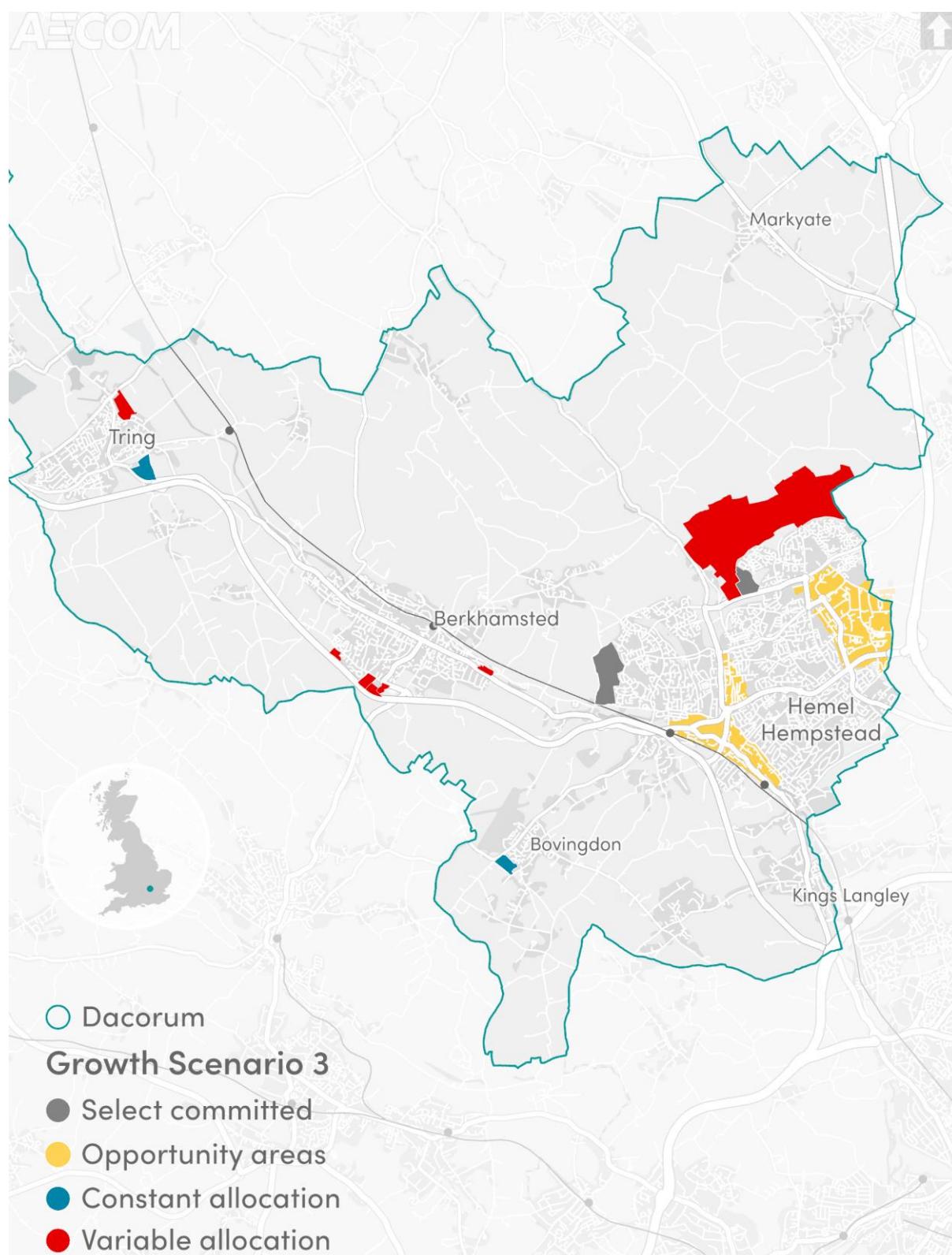
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**Growth scenario 2: Higher growth at Hemel Hempstead**



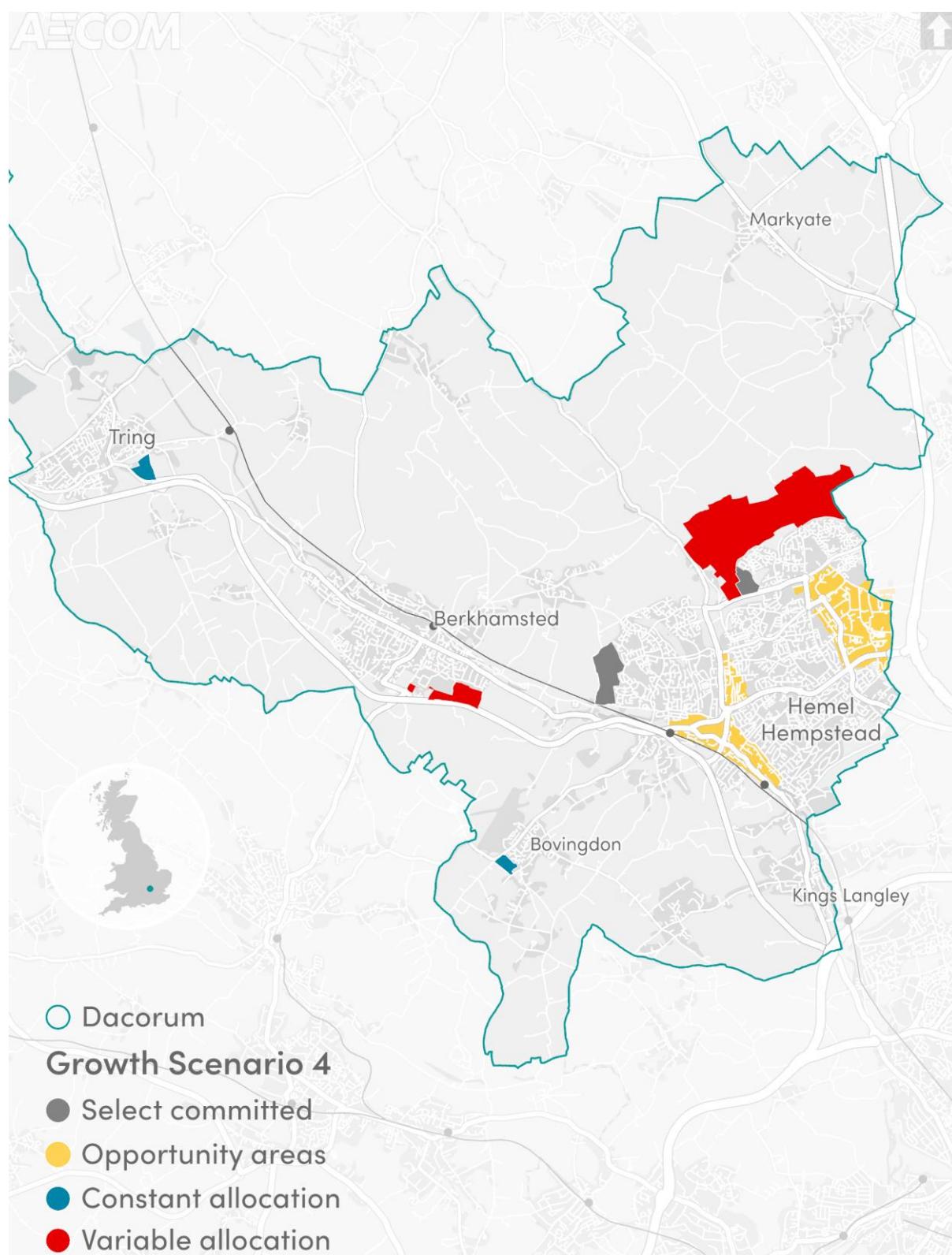
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**Growth scenario 3: Higher growth at Hemel Hempstead and Tring**

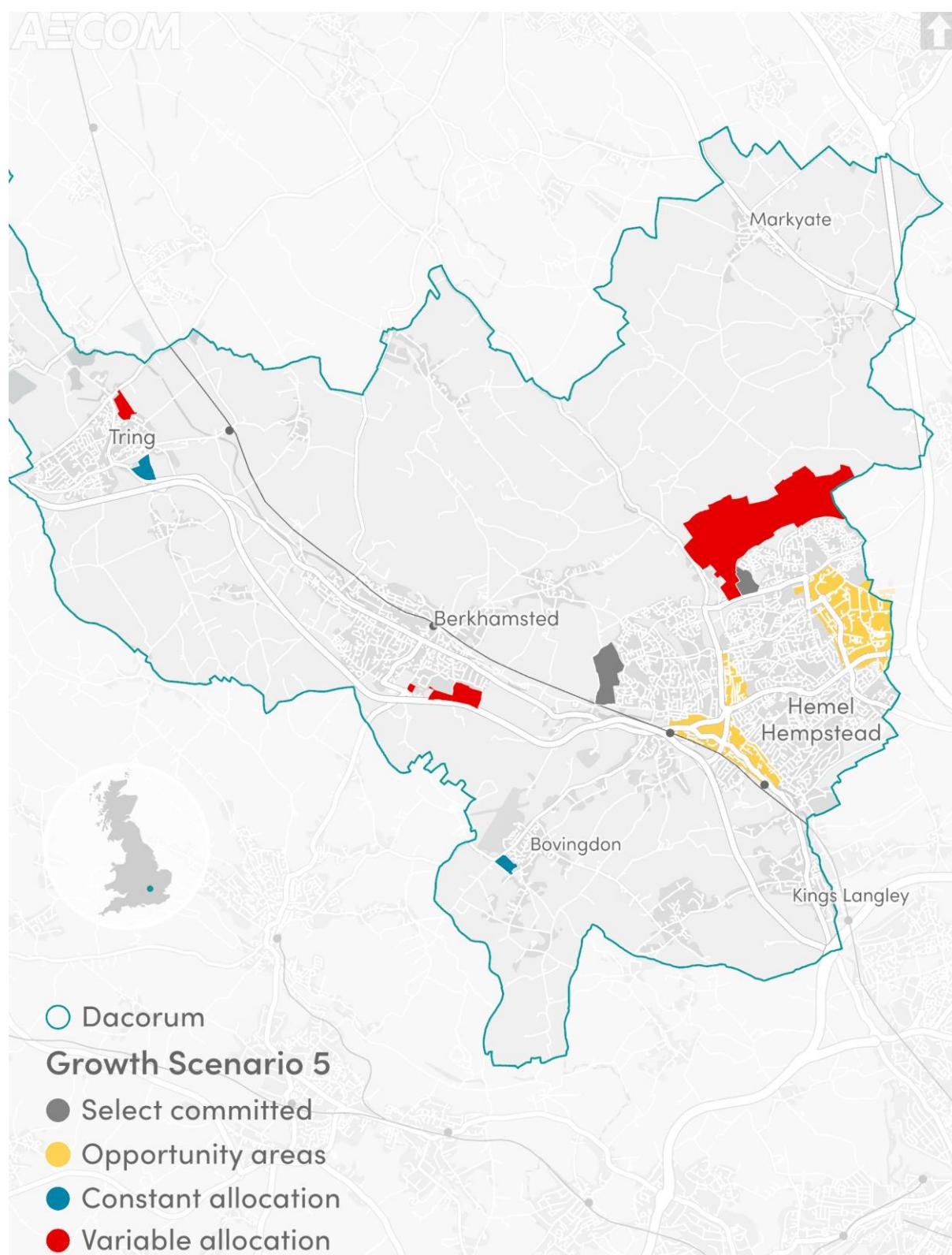


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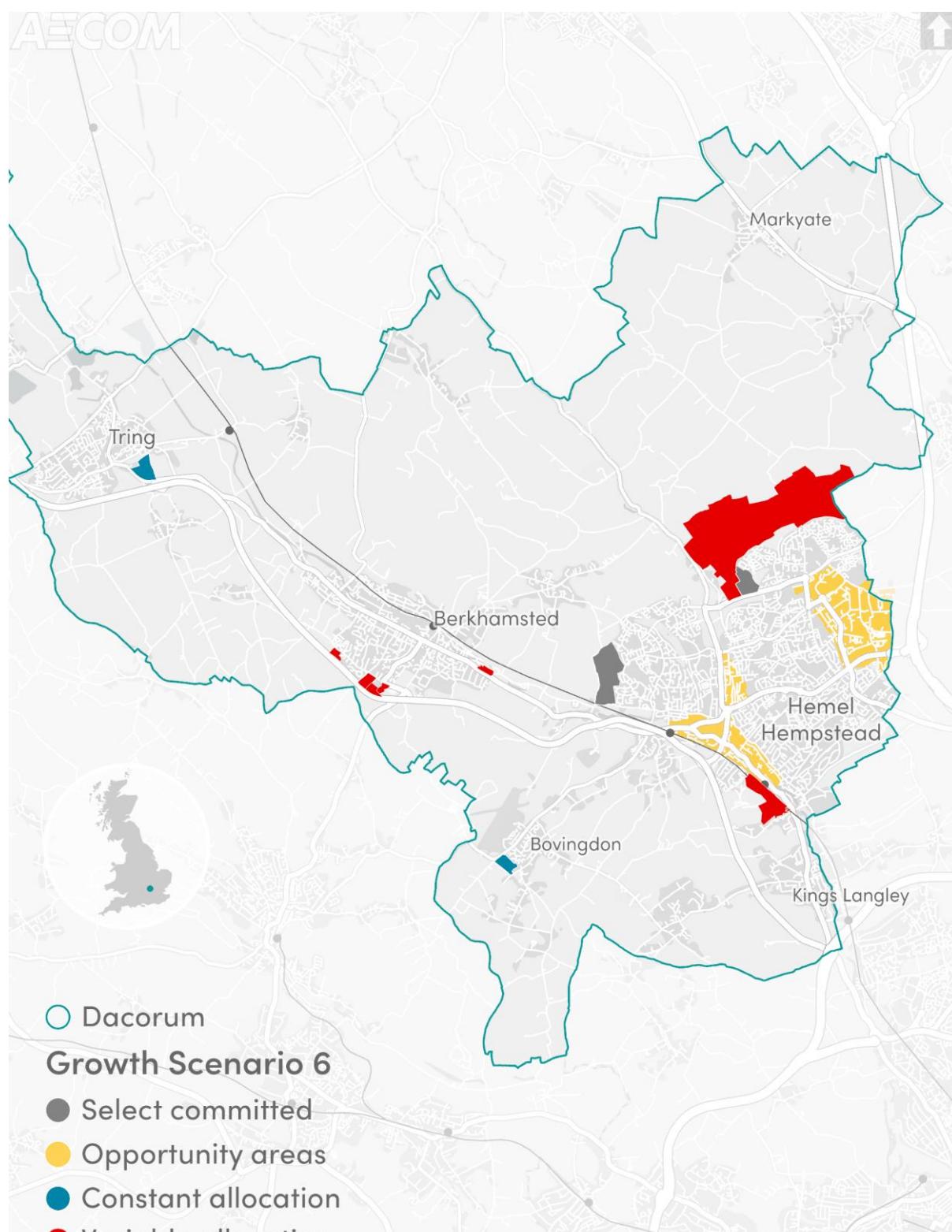
**Growth scenario 4: Higher growth at Hemel Hempstead and Berkhamsted**



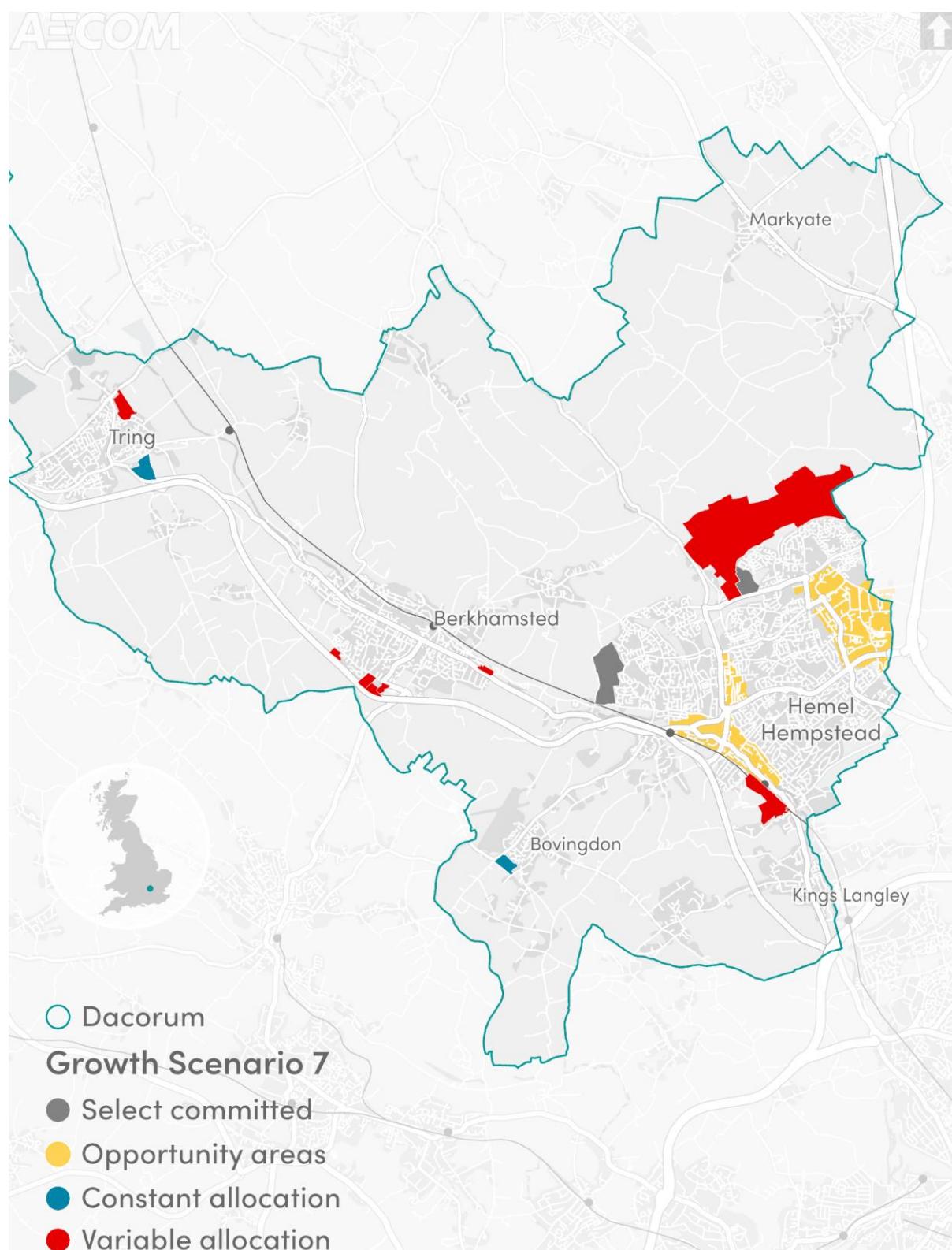
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**Growth scenario 5: Higher growth at Hemel Hempstead, Tring and Berkhamsted**

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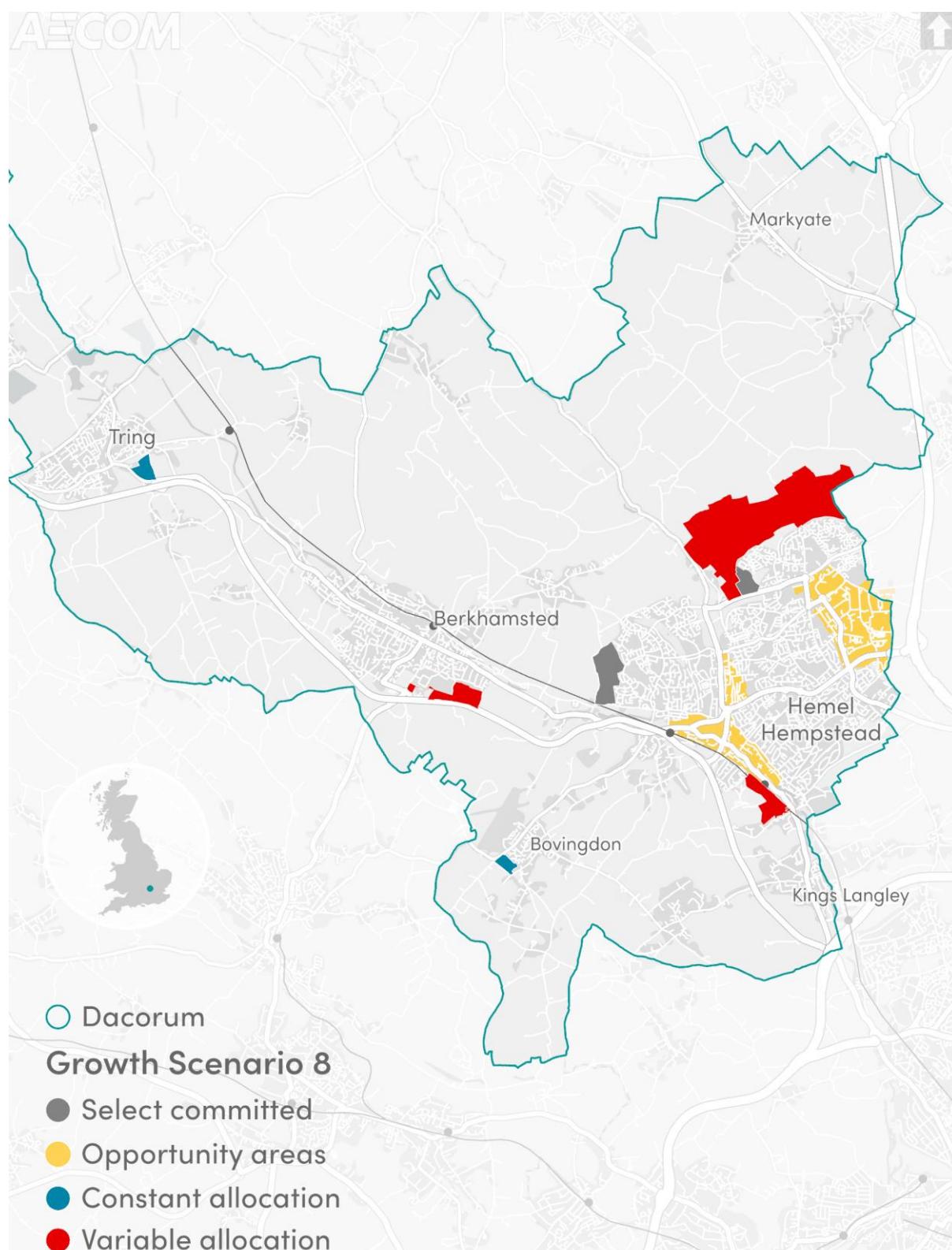
**Growth scenario 6: Highest growth at Hemel Hempstead**

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**Growth scenario 7: Highest growth at Hemel Hempstead, higher growth at Tring**

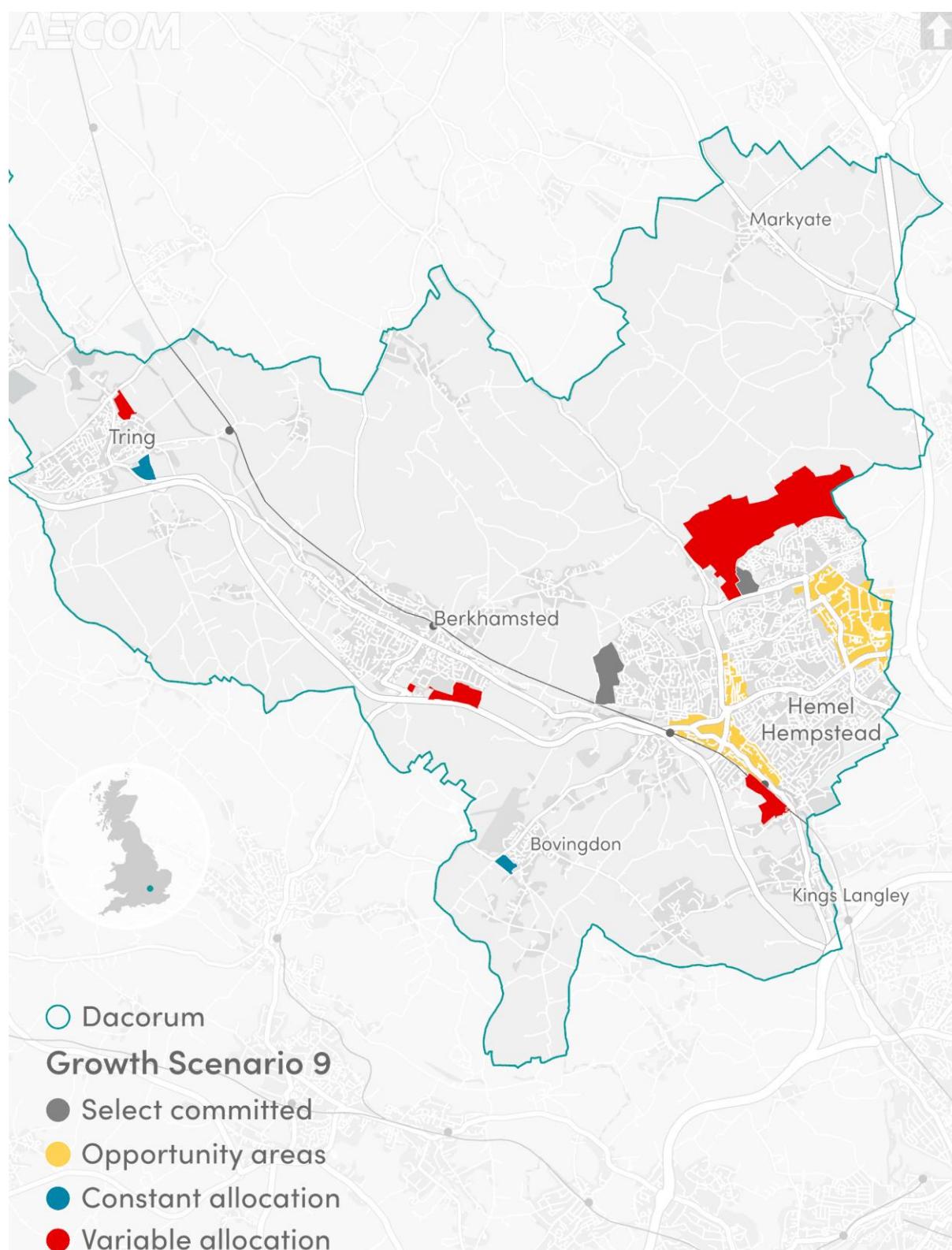
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**Growth scenario 8: Highest growth at Hemel Hempstead, higher growth at Berkhamsted**



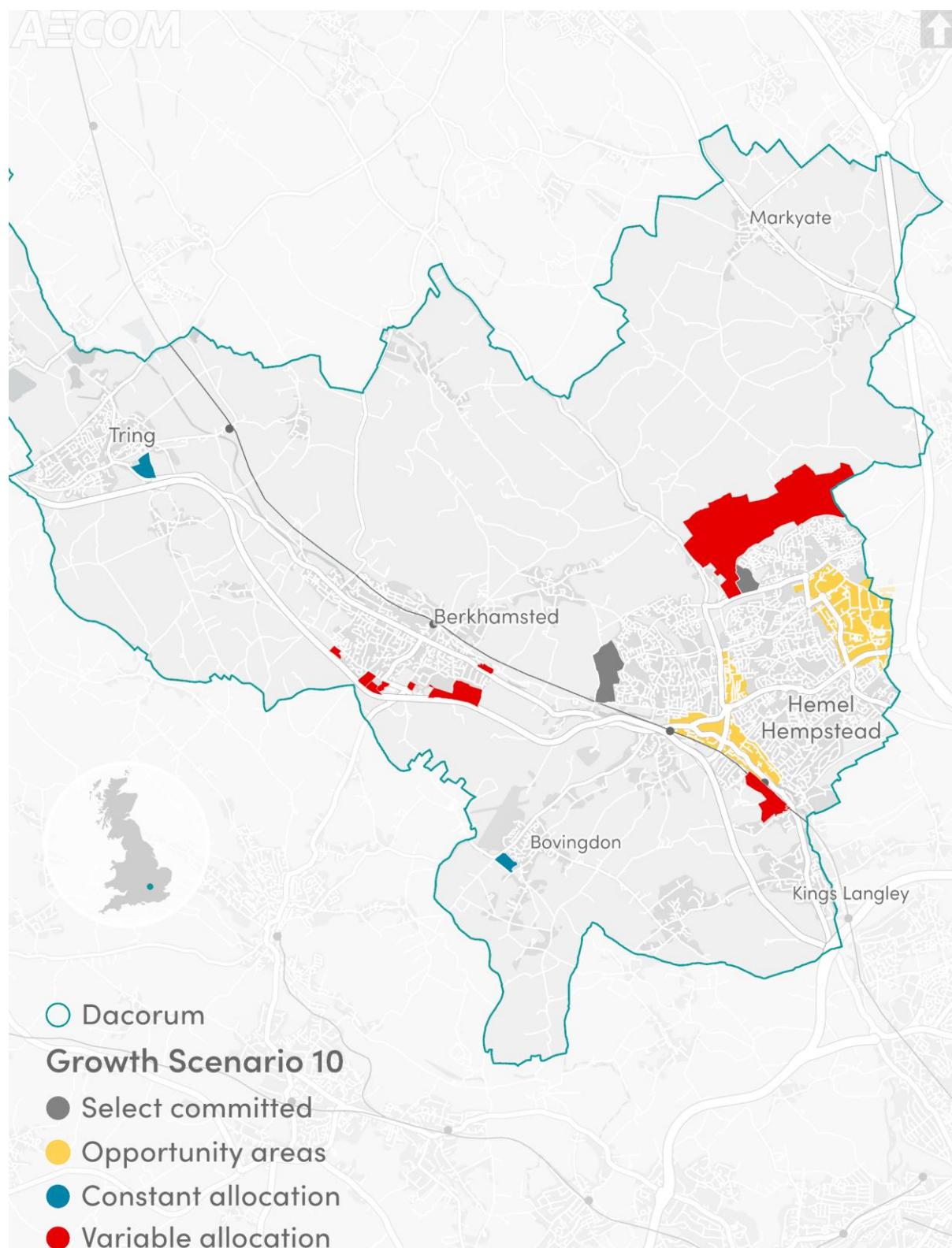
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**Growth scenario 9: Highest growth at Hemel Hempstead, higher growth at Tring and Berkhamsted**



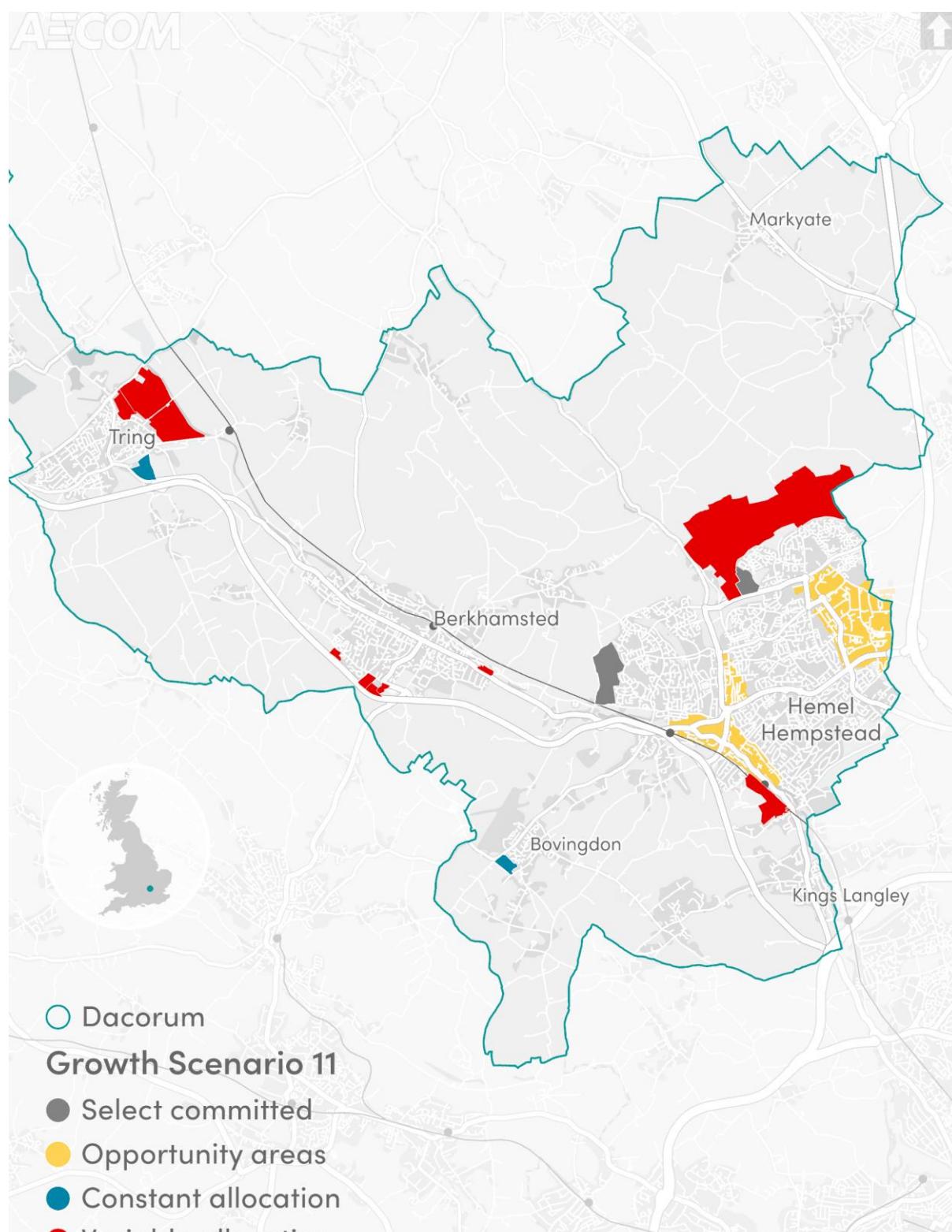
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**Growth scenario 10: Highest growth at Hemel Hempstead and Berkhamsted**



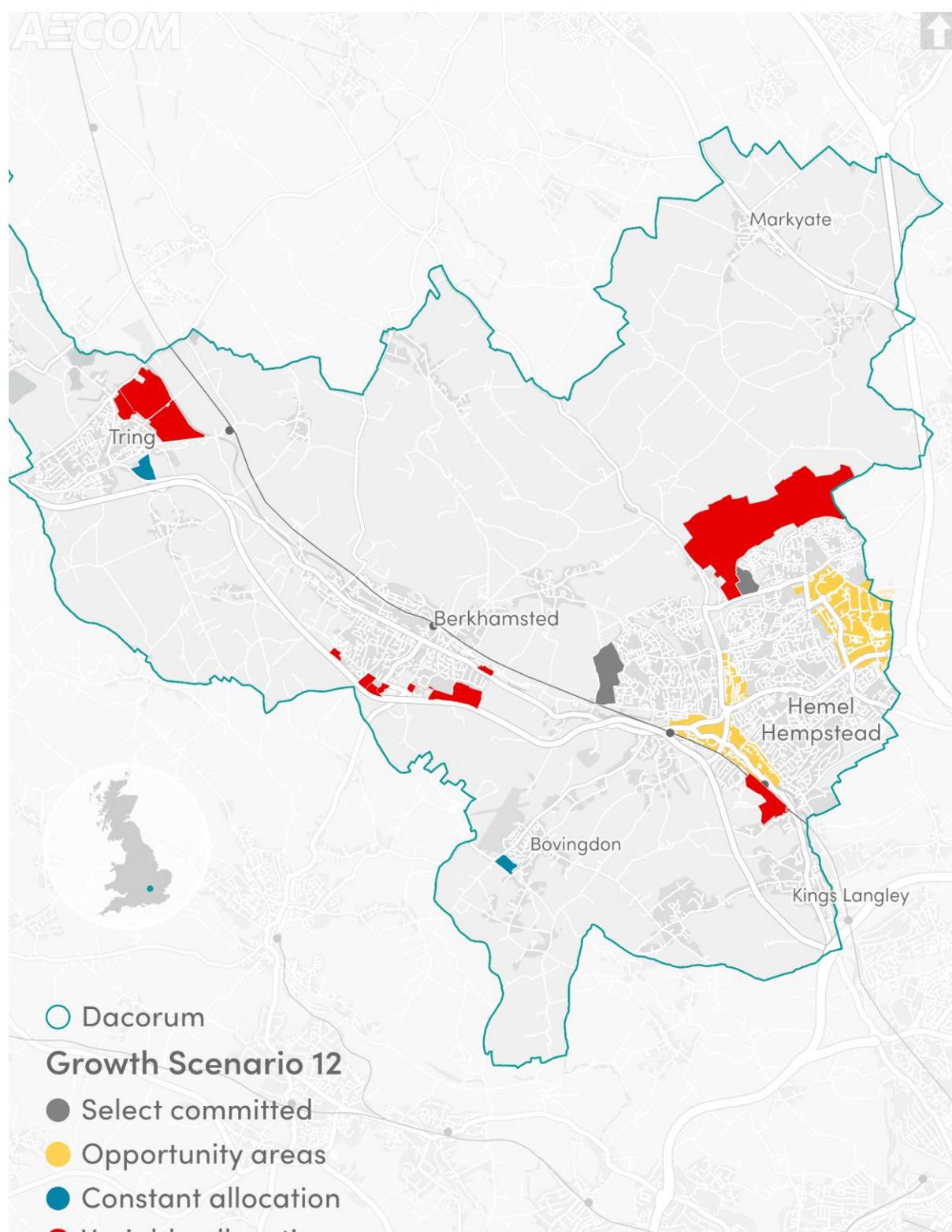
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**Growth scenario 11: Highest growth at Hemel Hempstead and Tring**



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**Growth scenario 12: Highest growth at Hemel Hempstead, Berkhamsted and Tring**



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# 6 Growth scenarios appraisal

## 6.1 Introduction

- 6.1.1 The aim here is to appraise the 12 growth scenarios (Section 5) under the SA framework (Section 3).

### Appraisal methodology

- 6.1.2 The appraisal is presented under 15 headings – one for each of the topics that together comprise the SA framework (see Section 3), before a final section presents an overview ‘matrix’. Under each heading, the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of ‘significant effects’ using red / amber / light green / green.<sup>12</sup>
- 6.1.3 It is important to be clear that there is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.
- 6.1.4 A final key methodological point to note is in respect of **growth quantum**. It is not always appropriate to simply conclude a preference for lower growth (Scenario 1) from an environmental perspective, despite the fact that housing growth inevitably leads to environmental impacts.
- 6.1.5 This reflects an assumption that Scenario 1 could either result in: unmet housing needs (if the housing requirement is set at a figure below LHN) that would have to be provided for elsewhere within a constrained subregion; or a housing supply trajectory that lacks robustness due to the lack of a sufficient supply buffer, leading to a risk of the Local Plan becoming out-of-date such that ‘the presumption’ applies.

## 6.2 Appraisal findings

- 6.2.1 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix.

N.B. colour shading for Hemel (**He**), Berkhamsted (**Be**) and Tring (**Tr**) corresponds to Table 5.2.

### Accessibility (to community infrastructure)

1 He	2 Be	3 Tr	4 Be	5 Be	6 Tr	7 Tr	8 Tr	9 Tr	10 Tr	11 Tr	12 Tr
4	2	3	2	2	2	3	1★	2	2	1★	2

- 6.2.2 The growth scenarios are placed in an order of preference that reflects the following factors:

- **Hemel Hempstead** – HGC represents a major opportunity to deliver new homes alongside schools and other community infrastructure, and there is also a need to consider the importance of supporting HGC in order to enable the St Albans Local Plan to progress. Also, there is support for Shendish Manor / Fairfields, which would deliver a new primary school that could support growth in the Two Waters area.
- **Berkhamsted** – South Berkhamsted is supported as it would deliver a new primary school; also a secondary school is adjacent. High growth could lead to an issue in respect of secondary capacity.
- **Tring** – high growth is supported as East of Tring would deliver a new secondary school. Also, Dunsley Farm, which is a constant across the scenarios, would deliver a primary school.
- **Growth quantum** – low growth is not supported as there is no certainty regarding the potential for unmet need to be provided for at locations that perform well in terms of accessibility to community infrastructure.

<sup>12</sup> Red indicates a significant negative effect; amber a negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect. No colour indicates a neutral effect.

- 6.2.3 With regards to **other constant growth locations**: Grange Farm, Bovingdon is tentatively supported as it will deliver community facilities (but not a primary school); high growth within the Hemel Hempstead urban area warrants ongoing scrutiny in terms of securing community infrastructure alongside homes; and there are not known to be any particular concerns with low growth at Kings Langley or Markyate.
- 6.2.4 In **conclusion**, there are significant opportunities to direct housing growth in such a way that opportunities to deliver new strategic community infrastructure alongside new homes are realised. However, there is a need for further work including consultation with the County Council and other key organisations.

### Air quality

1	2	3	4	5	6	7	8	9	10	11	12
He											
Be											
Tr											
3	2	2	1	1	2	2	1	1	3	2	3

- 6.2.5 There are two Air Quality Management Areas (**AQMAs**) in Hemel Hempstead and also AQMAs at several towns close to the Borough, including Aylesbury, Chesham, Watford and St Albans. Berkhamsted town centre also experiences significant traffic congestion, but there is not an AQMA (an AQMA at Northchurch was revoked in 2023). Another consideration is the aspiration for the HGC programme to support major strategic upgrades to the A414, benefiting a number of town centres across the sub-region.
- 6.2.6 The growth scenarios are placed in an order of preference that reflects the following factors:
- **Hemel Hempstead** – HGC is distant from a train station, but there are clear opportunities to deliver housing growth in a way that supports modal shift away from the private car towards active and public transport, e.g. with the potential to walk to schools and employment and the potential to cycle to Hemel train station (also employment at Harpenden) via an upgraded and extended Nickey Line. 500 homes at Shendish Manor / Fairfields is tentatively supported given the adjacent train station, but road access is a major challenge and the two Hemel Hempstead AQMAs are located nearby.
  - **Berkhamsted** – South Berkhamsted is well located for accessing a secondary school, the town centre and bus services along the London Road (A4251), plus facilities will be delivered onsite. As such, there are relatively limited concerns in respect of town centre traffic congestion. The other sites are less well-located in transport terms, particularly Blegberry Gardens, which is distant from the town centre and also associated with the Shootersway area, where housing growth risks problematic traffic congestion. Also, noise and potentially air pollution from adjacent main roads is an issue for all of the sites in question. A final consideration is potentially traffic through Chesham town centre, where there is an AQMA.
  - **Tring** – Land east of Tring is not ideally located in terms of accessing the town centre by walking/cycling or accessing the strategic road network, but parts of the site are reasonably close to the train station, and it is not clear that high growth at Tring gives rise to a concern regarding traffic through an AQMA. This includes the AQMA along the A41 east of Aylesbury, recognising that the Aylesbury's transport infrastructure is seeing transformational change aligned with strategic housing growth.
  - **Growth quantum** – low growth is not supported as there is no certainty regarding where (or, indeed, if) unmet need would be provided for. Housing need provided for distant from source risks problematic commuting patterns and there is a clear need for early certainty regarding growth quanta / distribution across a sub-region in support of effective strategic planning for transport infrastructure and services.
- 6.2.7 With regards to **other constant growth locations**: Grange Farm, Bovingdon will lead to some traffic through the Chesham AQMA (within Bucks) and there is a need to note the recently published Chesham Neighbourhood Plan, which proposes significant housing growth within the town. Also, high growth within Hemel warrants scrutiny in terms of parking and traffic congestion. Finally, the proposed low growth strategy for Kings Langley is potentially supported, albeit the village is well-connected by public transport.
- 6.2.8 In **conclusion**, whilst air quality is improving it is set to remain an issue. There are some significant constraints to growth locally, but there is also a need to avoid exporting unmet need. It is important to emphasise the importance of proactive local plan-making to enable effective strategic transport planning.

## Biodiversity

1	2	3	4	5	6	7	8	9	10	11	12
He											
Be											
Tr											
4	3	3	1	2	3	3	3	3	3	3	3

6.2.9 An overwhelmingly important consideration is supporting sites / growth locations where there is certainty, or a good degree of confidence, regarding the potential for a **SANG** solution to be in place ahead of new homes. However, the reality is that requirements around SANG are stringent to the extent that, should it transpire that a SANG solution is not in place, then the new homes would not come forward (leading to issues in respect of delivering on the committed housing land supply trajectory, with knock on implications).

6.2.10 The growth scenarios are placed in an order of preference that reflects the following factors:

- **Hemel Hempstead** – HGC is strongly supported from a perspective of securing new SANG alongside housing growth, indeed there would be spare capacity to support housing growth within the Hemel urban area. Aside from Ashridge, HGC is supported as a location for growth from a biodiversity perspective.

Shendish Manor / Fairfields does not have an identified SANG solution but a feasible solution can be envisaged (see Section 5.4). Aside from Ashridge, the site is subject to notable biodiversity constraint, reflecting a former parkland landscape (N.B. the housing estate to the north was never part of the landscaped grounds of Shendish Manor). Also, it is important to consider the strategic importance of the river corridor / valley (e.g. see the green infrastructure strategy within the Core Strategy ([2013](#)) and an earlier strategy from [2011](#)). In this respect, it is also important to note that the Draft Plan (2020) proposed a 5.6 ha employment allocation ~1km along the river corridor to the west.

With regards to strategic expansion to the north west, Ashridge is easily accessible, and it seems unlikely that a high quality SANG could be delivered within the current site boundary (without compromising wider elements of the scheme). However, there could be an opportunity to explore in respect of land to the north (a dry valley that is not currently accessible) and to the east (a significant cluster of ancient woodlands and also land strongly associated with the Gade valley (adjacent to Gadebridge Park).

- **Berkhamsted** – all of the sites in question are subject to limited biodiversity constraint, but it is only South Berkhamsted that has a likely SANG solution (N.B. the site is constrained by a small adjacent wooded common, which may link to other woodland nearby, albeit the A41 is a barrier). Another factor is the close association of Bank Mill with the river corridor (N.B. see SANG discussion in Box 5.6).

• **Tring** – in terms of SANG capacity there is a concern with the middle growth scenario, which would see allocation of New Mill (in addition to Dunsley Farm), as there is no identified SANG solution, although there is the potential for further work to confirm a SANG solution. With regards to Dunsley Farm, there is a need to confirm the potential for a SANG as part of the adjacent LWS, e.g. recognising that the value of the LWS could be somewhat tied to a farmed landscape. Across all the sites there are mature historic field boundaries (see [historic mapping](#)) in a geometric pattern (suggesting enclosure) but potentially of biodiversity value (e.g. noting that this is the case for the LWS adjacent to Dunsley Farm).

• **Growth quantum** – there is a clear theoretical case for low growth in Dacorum given the Ashridge constraint, at least ahead of further certainty regarding strategic and site-specific SANG. However, it is important to note that some locations that could potentially provide for unmet need are also constrained. The simple fact that the 12.6km buffer covers all of Dacorum but only a fairly small proportion of neighbouring authorities means that Dacorum has a particularly clear focus on securing SANG capacity.

6.2.11 With regards to **other constant growth locations**: Grange Farm, Bovingdon has a likely bespoke SANG solution and is otherwise notably unconstrained in biodiversity terms (also Bovingdon Brickworks, which is linked to the Box Moor Trust); and low growth at Kings Langley is potentially supported from a biodiversity perspective, given the site options in contention for allocation (see Section 5.4).

6.2.12 In conclusion, there is a clear case for proactively directing growth to sites / growth locations with an identified SANG solution, but the appraisal also accounts for the future possibility of SANG capacity in support of New Mill, Tring which is otherwise subject to limited biodiversity constraint.

## Climate change adaptation

1	2	3	4	5	6	7	8	9	10	11	12
He											
Be											
Tr											
=	=	=	=	=	=	=	=	=	=	=	=

- 6.2.13 A key consideration is the need to avoid development - in particular new homes - encroaching on **fluvial flood risk** zones, given worsened flood risk under climate change scenarios. Surface water flood risk is another consideration (of note in Dacorum given topography/geology including 'dry valleys') but this can often be dealt with through development management. Another consideration is development impacting on water flows and, in turn, down-stream flood risk; however, it is difficult to pinpoint issues ahead of detailed work, and it is typically the case that development can achieve no net worsening of run-off rates.
- 6.2.14 Overall flood risk constraint is limited across the variable growth locations, such that it is not possible to confidently place the scenarios in an order of preference. Considerations include:
- **Hemel Hempstead** – HGC is primarily associated with raised ground subject to limited flood risk, although there are significant surface water flood risk channels that would need to be accounted for as part of the green/blue infrastructure strategy, and there is also a need to ensure no increases to surface water flows reaching the River Gade, given significant downstream areas of flood risk. Shendish Manor / Fairfields is closely associated with the Gade valley, but there are no clear concerns in respect of flood risk. Finally, the option of strategic expansion to the north west does not give rise to flood risk concerns.
  - **Berkhamsted** – Bank Mill Lane falls outside of the fluvial flood risk zone, but surface water flood risk associated with the River Bulbourne would likely have an impact on the developable area within the site. It could feasibly be that housing growth could serve to deliver a modest enhancement to the river corridor, potentially with the effect of providing some flood water attenuation. The other sites in question at Berkhamsted are subject to limited flood risk, although a significant surface water flood channel intersects the 'Kingshill Way cluster' and there appear to be properties affected by flood risk downstream.
  - **Tring** – Dunsley Farm is unconstrained in flood risk terms, but the two sites to the east of the town are associated with significant surface water flood channels. It seems likely that there would be good potential to address surface water flood risk as part of a green / blue infrastructure strategy. It is noted that significant canal / riverside parkland is proposed as part of the current Land East of Tring application.
- 6.2.15 With regards to **other constant growth locations**, a key consideration is Grange Farm, Bovingdon, which is associated with a significant surface water flood channel, which impacts homes and the village centre downstream. Detailed work has been undertaken to explore the issue, and the potential for development to achieve a flood risk 'betterment' has been explored. A clear implication is the need to retain sufficient space within the site for blue / green infrastructure.
- 6.2.16 Other considerations are:
- **Markyate** – low growth is supported from a flood risk perspective, as fluvial flood risk is a significant issue for the one Green Belt site in contention for allocation to deliver higher growth (see Section 5.4).
  - **Kings Langley** – a somewhat similar situation to Markyate, given the close association of one of the sites in contention for allocation (Rectory Farm) with the River Gade corridor; however, likely less clear cut.
  - **Hemel Hempstead urban supply** - overheating is a climate change adaptation / resilience consideration (e.g. there is a need to ensure sufficient space for urban green infrastructure that provides shading). Also, there is also a need to scrutinise urban supply from a flood risk perspective, recognising that some existing low intensity land uses in urban areas (e.g. employment, commercial, car parking) may reflect flood risk. However, housing-led redevelopment of urban sites subject to flood risk is not uncommon nationally, given good potential to mitigate flood risk, including through: avoiding vulnerable uses on the ground floor; measures to ensure safe access / egress; flood resistant / resilient design.
- 6.2.17 In **conclusion**, it is not possible to differentiate between the growth scenarios and significant effects are not predicted. The Environment Agency will comment further on flood risk matters and might also alert the Council to any potential development-related opportunities for strategic flood water attenuation.

## Climate change mitigation

1	2	3	4	5	6	7	8	9	10	11	12
He											
Be											
Tr											
2	1	1	1	1	1	1	1	1	1	1	1

- 6.2.18 The discussion here focuses on per capita greenhouse gas emissions from the **built environment**, mindful that alignment of the reasonable alternative growth scenarios with strategic transport objectives is a focus of discussion under other topic headings. In particular, a focus of discussion here is in respect of the potential for each of the scenarios to support a focus on strategic growth locations to enable 'net zero development' (which should be onsite if at all possible, i.e. without having to resort to offsetting).
- 6.2.19 **Larger developments** can give rise to an opportunity over-and-above smaller developments, given economies of scale and also the possibility of delivering a mix of uses onsite, which can feasibly support one or more heat networks. Also, it is simply the case that large sites will generate a high degree of attention and scrutiny (including at the masterplanning stage), and housebuilders will often be keen to demonstrate good practice or even exemplar development. However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because large sites can face viability challenges due to the need to deliver major infrastructure upgrades. Also, heat networks are technically challenging to deliver, and practice is not well advanced nationally, with a clear opportunity currently only seen to exist where there is very high density development and/or a good mix of uses (to allow heat to be shared across the course of the day) and/or a source of waste or ambient heat that can be sourced (e.g. a watercourse).
- 6.2.20 Another important consideration is around ensuring that 'net zero development' is carefully defined. There are perhaps three key points to make. Firstly, any approach to net zero development must align with the **energy hierarchy**, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Secondly, there are two broad approaches to calculating and monitoring / evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an **energy-based approach**. The two approaches are compared and contrasted in a recent report [here](#).<sup>13</sup> Thirdly, it is important to be clear that the focus of discussion above is in respect of 'operational' energy/carbon, i.e. the energy used / carbon emitted as a result of the development's occupation / use. Additionally, there is a (crucially important) need to consider the '**whole life cycle**' of a development, to include the emissions associated with construction, maintenance, retrofitting and demolition.
- 6.2.21 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong **viability**, with a view to ensuring funding for decarbonisation measures (recognising that there are inevitably competing funding priorities, including affordable housing).
- 6.2.22 The growth scenarios are placed in an order of preference that reflects the following factors:
- **Hemel Hempstead** – HGC likely represents a considerable decarbonisation opportunity (although further work is needed). Large masterplanned schemes can be associated with particular opportunities in respect of onsite operational net zero emissions (and potentially even net positive, i.e. a net exporter of electricity to the grid), including given the potential for strategic battery storage. However, national understanding in respect of the nature of these opportunities is not well advanced. There could also be an opportunity to minimise embodied and other 'whole life cycle' emissions, including feasible via support for modern methods of construction. The Hertfordshire Growth Board is seeking to place the County at the forefront of "[offsite manufacture](#)" practice nationally, building on Hertfordshire's heritage as a "cradle for continuous experiment in the making of cities". It could well be the case that support for HGC, in combination with strategic growth locations elsewhere in the sub-region, helps to build a business case for an Modern Methods of Construction (MMC) facility.

<sup>13</sup> Under the Building Regulations methodology the question for any given planning application is the extent to which the development can exceed the regulatory requirement, measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh / m<sup>2</sup>/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter.

With regards to the other Hemel Hempstead growth options in question: Shendish Manor / Fairfields performs very well in terms of minimising per capita carbon emissions from transport, given an adjacent train station, but there is not known to be a particular built environment decarbonisation opportunity (the 2021 vision document does not mention issues around carbon / decarbonisation, and there could also be a need for costly road infrastructure). With regards to a NW strategic urban extension, the simple fact is that little or no work has been undertaken in respect of a vision / concept, nor in respect of SANG solutions (which could prove costly), which does not bode well for built environment decarbonisation.

- **Berkhamsted** – the sites in question are not known to be associated with any particular built environment decarbonisation issues or opportunities. The scale and mix of uses onsite (also adjacent) at South Berkhamsted could suggest an opportunity, but site promoter materials received to date do not suggest any particular net zero ambition or opportunity. The Kingshill Way cluster comprises sites in different land ownership, which lead to challenges around development viability. The other two sites in question are smaller sites, but it could still prove to be the case that there is an opportunity to achieve onsite net zero operational development. Blegberry Gardens seems unlikely to be associated with abnormal development costs / issues that might conflict with net zero ambitions (other than SANG).
- **Tring** – the Energy Strategy submitted as part of the planning application for Land East of Tring (ref. [22/01187/MOA](#)) proposes to go well-beyond the requirements of Building Regulations, in terms of operational emissions (Section 13 of the report), but does not consider offsetting in order to achieve 'net zero'. There is also a discussion in Section 7 of the report around the merits of using an energy-based (or 'energy use intensity') approach to measuring performance, but this does not appear to feed through.

With regards to the other sites at Tring (Dunsley Farm and New Mill), these are not known to be associated with any particular built environment decarbonisation issues or opportunities. Dunsley Farm is set to provide a significant amount of land for non-housing uses, whilst New Mill seems unlikely to be associated with abnormal development costs / issues that might conflict with net zero (other than SANG).

#### 6.2.23 With regards to **other constant growth locations**:

- Grange Farm, Bovingdon - is the subject of a current planning application for a higher density scheme than assumed here (ref. [23/02034/MFA](#)), which is a viability consideration. The submitted Sustainability Statement discusses the potential to go significantly beyond the requirements of Building Regulations, but not to the extent of Land East of Tring. Again, it does not discuss offsetting to achieve net zero.
- Hemel urban supply – warrants scrutiny from a built environment decarbonisation perspective (but is broadly supported from a transport decarbonisation perspective). High density urban sites can give rise to inherent opportunities, potentially to include supply of heat via a heat network (particularly where there is a fine grained mix of uses); however, development viability can be challenging, which can limit the potential for an ambitious approach to operational net zero development (just as it can hinder the ability to deliver affordable housing). There is also a need to consider embodied emissions, and particularly the extent to which there would be support for reuse of buildings ahead of demolition and rebuild.

#### 6.2.24 In **conclusion**, there is a built environment decarbonisation opportunity associated with HGC and certain other sites, hence Scenario 1 is not supported (plus low growth performs poorly from a transport decarbonisation perspective). However, it is not possible to differentiate further between the scenarios.

#### 6.2.25 With regards to significant effects, whilst all scenarios would likely see an improvement on the baseline (a situation whereby growth comes forward in the absence of a Local Plan, whether that be in Dacorum or elsewhere in order to address unmet need from Dacorum), there is a need to reach conclusions taking account of established objectives and targets.

#### 6.2.26 In particular, whilst the Borough's net zero target date is 2050 (N.B. many local authorities have set 2030 as a target date) there is a need to account for the clear commitment within the Draft Local Plan (2020) to ensure that all development comes forward as 'net zero development' (operational emissions only) by 2030. In this light, there is a high bar to reach before predicting positive effects of any significance.

#### 6.2.27 It is hoped that it will be possible to predict significant positive effects at the next stage (Regulation 19); however, at this current stage there is insufficient evidence of built environment decarbonisation being integrated as a key factor with a bearing on spatial strategy and site selection to the extent that there can be confidence in respect of achieving net zero development. There is a need for further work to confirm particular spatial strategy, site and scheme-specific decarbonisation opportunities.

## Communities

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6.2.28 There are a **wide range of factors** that could be discussed under this heading, such that it is inherently challenging to differentiate between the growth scenarios with any confidence.

6.2.29 The growth scenarios are placed in an order of preference that reflects the following factors:

- **Hemel Hempstead** – HGC represents an opportunity in two key respects. Firstly, there is a clear commitment to delivering the scheme in line with garden community principles, including with a focus on: stakeholder engagement; community stewardship; and delivering infrastructure alongside new homes, including community infrastructure (as discussed), transport infrastructure (including active travel; also good bus services) and green infrastructure (see the maps presented in Section 5.2). Secondly, the clear intention is for HGC to support regeneration of nearby existing local centres, thereby helping to address existing hotspots of relative deprivation, plus HGC is supportive of regeneration within the Town Centre and Two Waters Opportunities Areas, including via SANG provision.
- **Berkhamsted** – certain concerns have already been discussed above, relating to schools capacity, traffic and also the proximity of growth options to the A41 (also the railway line and the London Road, in the case of Bank Mill Lane). South Berkhamsted represents a good opportunity to deliver housing growth in a way that minimises local community concerns.
- **Tring** – Dunsley Farm gives rise to limited concerns and will deliver benefits to the town. With regards to the option of a strategic urban expansion to the east, the scheme would deliver significant benefits but is notably peripheral to the town and would alter the relationship of Tring with the canal corridor and the Chilterns escarpment to the east. It is difficult to comment further, without reviewing the issues explored as part of the process of considering the planning application that is currently subject to appeal. One other point to make is that Tring benefits from very good accessibility to high quality countryside.
- **Growth quantum** – there is every likelihood that unmet need from Dacorum would lead to pressure for unpopular urban extensions elsewhere within a constrained sub-region. It could feasibly be that the South West Herts Joint Strategic Plan identifies one or more new settlement options, equally it might be the case that new settlement options are identified close to Dacorum through the Buckinghamshire Local Plan (which is currently at the early stages of preparation), but there is no certainty at the current time.

6.2.30 With regards to **other constant growth locations**:

- Grange Farm, Bovingdon – is notably supported in principle by the Parish Council.
- Hemel urban supply – a primary consideration is potentially a need to maximise urban supply in order to minimise pressure on the Green Belt, which is often an issue of paramount importance to local communities. Also, maximising urban supply from the two Hemel Opportunity Areas aligns with established regeneration objectives, including as set out within the Hemel Town Centre Vision (2023), which notably proposes numerous redevelopment opportunity sites over-and-above those assumed under the current growth scenarios. However, there is also a need to consider potential tensions between high / higher density urban redevelopment and communities objectives.

6.2.31 In **conclusion**, it is considered appropriate to flag a concern with the lowest growth scenario and those scenarios involving the highest growth scenarios for Berkhamsted and/or Tring to reflect concerns raised through the Draft Local Plan consultation (2020).

6.2.32 A ‘moderate or minor’ negative effect is flagged only for the lowest growth scenario. For other scenarios, whilst it is recognised that proposed housing growth will inevitably give rise to a strong degree of concern amongst local communities, it is important to recognise that without a Local Plan housing growth would come forward but in a relatively unplanned way.

## Economy and employment

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- 6.2.33 The Draft Local Plan (2020) was unable to provide for employment land needs in full, explaining:

*“Accommodating the Borough’s indicative floorspace growth figures for office and industrial space is very challenging... Indeed, our shortfalls are now larger than stated in the Economic Study Update, as explained in the Economic Development Topic Paper... Given this, we asked the other South West Hertfordshire authorities if they could take our unmet need. Dacorum and St Albans councils are working together to ensure that most of our unmet need will be accommodated on the East Hemel Hempstead site in St Albans City and District. This site is ideally located, as it will act as an extension to Maylands Business Park. It also forms the principal development opportunity in the Herts IQ Enterprise Zone.”*

- 6.2.34 The St Albans Draft Local Plan (2023) confirmed this approach, explaining the following in respect of the proposed employment land strategy supported by the plan: *“Due to these locations providing an agreed oversupply for St Albans District’s own needs, the excess will assist Dacorum Borough and potentially other South West Herts local authorities in meeting some of their employment requirements.”*

- 6.2.35 The growth scenarios are placed in an order of preference that reflects the following factors:

- **Hemel Hempstead** – it is crucially important to support Hemel Garden Communities (HGC), as were the HGC programme to fail then it could prove challenging to deliver a strategic extension to Maylands Business Park, including in terms of securing strategic road infrastructure upgrades.
- **Berkhamsted** – there is not known to be any particular growth related opportunity around delivering new employment land or otherwise realising objectives relating to the local or wider economy. It is noted that one of the three sites within the Kingshill Way cluster comprises the BFI National Film Archive.
- **Tring** – Dunsley Farm would deliver new employment land that will add to the local employment offer at Tring and assist (modestly) with closing the gap to the established borough-wide need figure.
- **Growth quantum** – there is a need to deliver homes in support of the local and subregional economy. Supporting the success of Herts IQ is a key consideration, but Luton and Aylesbury are also employment and economic growth hubs of at least regional importance.

- 6.2.36 With regards to **other constant growth locations**, the employment land allocations within the Draft Local Plan (2020; introduced in Box 5.11) are all currently under review and a final decision will be made at the next stage of plan-making. From an ‘economy and employment’ perspective there is a clear case for allocation in order to close the gap to the established need figure, and also with a view to providing local employment opportunities (e.g. Bovingdon Brickworks is adjacent to Bovingdon).

- 6.2.37 In **conclusion**, there is a clear concern with Scenario 1, which omits support for HGC, and the order of preference also aims to show support for higher growth at Hemel Hempstead given Herts IQ ambitions.

## Health and wellbeing

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- 6.2.38 It is not possible to confidently differentiate the growth scenarios over-and-above in respect of issues / opportunities already discussed above under ‘Communities’.

## Historic environment

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6.2.39 The growth scenarios are placed in an order of preference that reflects the following factors:

- **Hemel Hempstead** – HGC overall represents a good opportunity to direct growth to an area with fairly limited historic environment constraint, reflecting the fact that this was a historically rural area prior to development of Hemel Hempstead as a mid-20<sup>th</sup> Century new town. However, the Gade valley at the western extent of HGC is a historic transport corridor, associated with two conservation areas. Other considerations include encroachment on farmsteads and wider impacts on a historic farmed landscape.

Similar considerations apply to the option of strategic urban extension to the north west, although this is a notably different historic landscape, with nearby Potten End located on high ground at the southern extent of Ashridge. With regards to Shendish Manor / Fairfield, there is historic environment sensitivity here as the land in question comprises former parkland associated with Grade II listed Shendish Manor.

- **Berkhamsted** – none of the sites in question are subject to any particular historic environment constraint, but there is broadly a concern with higher growth leading to traffic that effects the historic character of Berkhamsted town centre. The site known as Bank Mill Lane would presumably not be accessed from Bank Mill Lane itself, which is a narrow historic lane associated with three listed buildings. This is one of the few sites that Historic England objected to through the Draft Local Plan consultation (2020), given the adjacent Berkhamsted Conservation Area, requesting a Heritage Impact Assessment.

- **Tring** – Dunsley Farm is in close proximity to Tring Conservation Area and Grade II listed Tring Park Registered Park and Garden is adjacent. However, it is not clear that the land in question contributes significantly to the setting of the conservation area or the parkland, and the site benefits from good access to the A41, such that there are limited concerns regarding traffic through the town centre.

New Mill appears to be quite unconstrained in historic environment terms, and there are also limited designated historic environment assets constraining Land east of Tring, although encroachment on the Grand Union Canal is a clearly an issue. The proposal is to significantly buffer the canal corridor, but there would be impacts to the current rural setting of the canal, including as viewed from nearby high points along the Chilterns escarpment (see topographic map [here](#)). A Heritage Statement recently prepared by the site promoters as part of the current application concludes:

*"The only designated built heritage assets facing any impact, with a section of the Site forming a part of these assets' setting, are the Grade II listed Pendley Manor Lodge and the former Pendley Manor Stables. The only non-designated built heritage assets facing any impact... are the Grand Union Canal and Ivy Cottage... The identified levels of harm to the significance of the two identified designated built heritage assets will be in the spectrum of less than substantial harm."*

- **Growth quantum** – it is difficult to suggest a likelihood of unmet need from Dacorum being provided for at locations elsewhere subject to lower historic environment constraint. For example, the historic environment is a constraint to further expansion of Aylesbury beyond that which is already committed.

6.2.40 With regards to **other constant growth locations**, Grange Farm, Bovingdon is subject to fairly limited historic environment constraint, although a Grade II listed building is adjacent to the north and the historic hamlet of Bovingdon Green adjacent to the south. Within Hemel town centre there are perhaps limited historic environment constraints to growth relative to many other town centres; however, it is important to note that [historic mapping](#) shows extensive built form around the town centre area (i.e. extending far beyond Hemel Old town) as well as extensive industry and other built form in the Two Waters area (some of it relating to its paper making heritage). The Old Town proposed allocation (90 homes) is another consideration, although it is important to note that this is an existing allocation.

6.2.41 Also, the 'new town' character gives rise to sensitivities. It is noted that Historic England objected to the Market Square allocation in 2020 on the basis that the site forms part of the setting of the Water Gardens and the New Town's urban design and supports Sir Geoffrey Jellicoe's original design intentions. The intention remains to allocate this site, but steps can be taken to address heritage concerns.

6.2.42 Finally, it is recognised that there is wide-spread archaeological constraint affecting the Borough; however, it is difficult to know how to treat known or potential archaeology as a constraint outside of Scheduled Monuments (which are of national significance and a clear constraint to development). The following is the conclusion reached as part of the applicant's Archaeological Assessment for Land East of Tring:

*"An 'Area of Archaeological Significance' identified in the Local Plan lies in the south-west part of the site.*

*An enclosure of probable Iron Age or Roman date lies within this Area of Significance, identified from cropmarks visible on aerial photographs. Agricultural activity associated with the enclosure might be anticipated in its immediate vicinity, although there is no aerial photographic evidence to define any contemporary activity.*

*Centuries of ploughing will have had a widespread damaging impact on any underlying archaeological deposits within and associated with the enclosure, reducing the significance of this asset to less than national (ie local or regional) significance.*

*However, in view of Local Plan Policy 118... there is potential to incorporate the cropmark enclosure within an area of open space in the masterplan for the site, thereby achieving in-situ preservation. If this solution is not feasible, a programme of archaeological evaluation will be required to establish the significance of the archaeology within the Area of Archaeological Significance and enable an informed planning decision. The extent and apparent significance of the area of archaeological interest does not present an overriding constraint to the development.*

*A prehistoric routeway which continued in use during the Roman period known as the Ickneild Way is projected to bound the site to the north. Evidence of roadside activity associated with this routeway cannot be ruled out. Any evidence would be considered to be local to at most regional significance. Across the remainder of the site evidence of Medieval and later agricultural activity can be anticipated which would be at most of local interest.*

*Outside of the Area of Archaeological Significance the proposed development therefore has the potential to impact archaeological remains of a local to at most regional importance and as such would not present an overriding constraint to development. However due to the size and greenfield nature of the site it is likely that the archaeological advisor at Hertfordshire County Council would require a programme of fieldwork to support the planning application."*

6.2.43 In **conclusion**, Scenarios 4 and 5 are judged to perform well because: HGC represents something of an opportunity in respect of minimising tensions between growth and the historic environment (subject to ongoing work on the Gade valley); Shendish Manor / Fairfield is subject to a degree of constraint (although there is likely good potential to address this through masterplanning); South Berkhamsted is subject to limited constraint and performs well from a traffic perspective; and, on balance, there is a concern with Land East of Tring from a historic environment perspective, including given onsite archaeology.

6.2.44 A 'moderate or uncertain' concern is flagged only in respect of the worst performing scenario only (low growth without HGC), but Historic England will wish to comment further on effect significance.

6.2.45 Comments on the relative merits of alternative scenarios would be welcomed with a view to effective and efficient plan-making, although there may also be the potential to undertake detailed Heritage Impact Assessment work for emerging preferred allocations. There is a need to target resources carefully and avoid Heritage Impact Assessment undertaken late in the process leading to uncertainty around the potential to take a site forward, or in respect of the number of homes that can be delivered (also when), recognising that this can lead to significant knock on implications for the plan as a whole.

## Homes

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8	7	6	6	5	5	4	4	3	3	2	1

6.2.46 The headline consideration is the **housing requirement** that would be set under each of the scenarios, i.e. the number of homes that the Council would commit to delivering annually. It is also important to ensure that **supply** exceeds the requirement (at least in the early years of the plan period, given the potential to boost supply for latter years through a plan review), as failing to deliver on the housing requirement could render the Local Plan out-of-date (leading to issues as discussed in Section 2).

6.2.47 Under **Scenarios 11 and 12** the housing requirement would be set at Local Housing Need (LHN) with a supply buffer. However, Scenario 12 is the preferable scenario, due to a higher supply buffer, and recognising that certain aspects of the proposed/assumed supply are associated with a degree of delivery risk. For example: HGC is inherently at risk of delay as a large and complex site; urban supply is inherently associated with complexities that can delay development; and further detailed work is needed in respect of SANG capacity across the Borough. Having said this, some of the sites have strong deliverability credentials (notwithstanding SANG solutions), with sites in the control of a single land owner (a housebuilder in a number of cases) and fairly limited need for strategic transport infrastructure upgrades.

6.2.48 In contrast, **Scenarios 1 to 10** would necessitate a housing requirement set below LHN, such that the Local Plan generates unmet housing need. Generating unmet housing need is highly problematic, from a housing perspective, for two reasons. Firstly, housing need must be met as close to source as possible. Secondly, there is currently little or no certainty regarding where, when or even if any unmet need generated by the Local Plan would be provided for, such that it might ultimately stay unmet. It is important to recognise (and reiterate) that unmet housing need is already a significant concern in the sub-region.

N.B. under Scenarios 7 to 10 it could be the case that it is ultimately possible to set the housing requirement at LHN (such that the Local Plan does not generate unmet need) by the time of finalising the plan for publication under Regulation 19. This reflects the fact that additional urban supply may be identified (noting that the Hemel Town Centre Vision identifies a number of development opportunity sites over-and-above those currently proposed for allocation in the plan) and also noting that one or more sites not currently assumed for allocation under these scenarios could feasibly gain planning permission.

6.2.49 Further key points for consideration area as follows:

- **Delivery risk** – certain aspects of the supply (as assumed under the various scenarios) potentially subject to significant delivery risk have already been identified above. It is also important to note that little work has been undertaken in respect of vision, concept, SANG solution and infrastructure requirements for an urban extension to the north west of Hemel Hempstead (which features only in Scenario 1, as a replacement for HGC). The implication is that, were the decision to be taken to support growth here instead of HGC, then there would be a need to delay the plan whilst a considerable amount of work is undertaken to confirm that a suitable scheme is deliverable / developable.
- **Timing of delivery** – there is a need to ensure a balanced housing supply trajectory across the plan period, accounting for committed sites as well as new supply identified through the Local Plan. There is overall considered to be a good mix of site sizes, which should assist in this respect, plus some of the larger proposed growth locations will be able to come forward in phases. The smaller sites at Berkhamsted (also New Mill at Tring) that feature under certain scenarios would have the potential to come forward early in the plan period if not for the lack of an identified SANG solution.
- **Geographical spread** – there is a need to recognise that there will be very locally arising needs – i.e. needs associated with specific settlements. In this respect low growth at Kings Langley and (in particular) Markyate is noted. Also, there is a need to avoid over-concentrations of growth that risks market saturation (impacting delivery). There are not known to be any major issues, but attention focuses on Hemel Hempstead.

- **Affordable housing** (and, more generally, development viability) – there are no particular concerns regarding development viability at greenfield sites in Dacorum and, in turn, no particular concerns regarding the potential to deliver a policy compliant quota of affordable housing (alongside compliance with other policy requirements). However, there is a need for further work to confirm the potential to deliver affordable housing as part of brownfield redevelopment in Hemel Hempstead.

It is noted that the planning application for Land East of Tring proposes 45% affordable housing, which is very high (although there is also a need to consider the tenure breakdown). This is discussed within the Decision Notice issued in response to planning application [22/01187/MOA](#), although the matter could potentially be revisited as part of the ongoing appeal. Potential need for specialist accommodation is another consideration, which may warrant further investigation prior to plan finalisation.

Look to the next stage of plan-making, it is hoped that detailed viability work will confirm the potential to set an ambitious requirement in terms of affordable housing, both in terms of total number of affordable homes delivered (as a percentage of total housing at qualifying schemes) and in terms of tenure split (with a need to support 'genuinely affordable' housing as far as possible, e.g. 60% of market rent).

- **Gypsy and Traveller accommodation needs** – this may prove to be a key matter for consideration at the next stage of plan-making. The Draft Local Plan (2020) identified two new sites but would lead to a shortfall against the identified need, once account is taken of the accommodation needs of those who do not actively travel. The Draft Local Plan gave careful consideration to the needs of those who do not actively travel, and the importance of doing so has clarified significantly since 2020.

The only site that is a variable across the scenarios with clear potential to deliver Gypsy and Traveller pitches is HGC. On this matter, the Interim SA Report for the St Albans Draft Local Plan explained:

*"A [key] issue is meeting Gypsy and Traveller accommodation needs, with it being apparent that the St Albans Local Plan would likely generate significant unmet need in the absence of HGC, in the context of a sub-region where unmet need is already an issue (or, at least, a potential issue)..."*

*... the proposal is to allocate two deliver two new sites within HGC for a total of 30 – 40 pitches. This figure falls significantly below the level of need discussed within the... Accommodation Assessment (2019), particularly if account is taken of the accommodation needs of those who do not actively travel but nonetheless seek accommodation on a site locally... Further evidence may be required to establish an up to date figure for needs that will have to be further addressed as the draft Plan evolves."*

Every effort must be made to meet needs, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers tending to experience very poor outcomes in terms of health, education and a range of other indicators (see [www.gypsy-traveller.org/our-vision-for-change](http://www.gypsy-traveller.org/our-vision-for-change)). Also, it is important to recognise arguments for stand-alone sites for Gypsies and Travellers (including from a delivery perspective), and there can also be reasons for supporting expansion of existing sites.

- 6.2.50 In **conclusion**, there is a clear need to rank the scenarios in order of total growth quantum. There is clear support for Scenario 12 as the housing requirement would be set at LHN with a sufficient supply buffer, such that there would be confidence in the ability to provide for LHN in practice over the course of the plan period. Furthermore, there would be a balanced supply, in terms of site size, type, location and timetable for development. However, even under Scenario 12 there remain uncertainties, including around providing for affordable housing and meeting Gypsy and Traveller accommodations needs.

## Land and soils

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- 6.2.51 The nationally available dataset (available at [magic.gov.uk](#)) shows the great majority of the Borough to comprise **grade 3 quality agricultural land**, where grade 1 quality land is that which is of the best quality nationally. However, there are also notable areas of grade 2, including notably to the east of Tring.

6.2.52 This enables differentiation between the scenarios. However, there is uncertainty because the national dataset is very low resolution and also low accuracy, in that it does not differentiate between land that is of grade 3a quality ('best and most versatile' (BMV) under the [NPPF](#)) and that which is of grade 3b quality.

N.B. there is also a second agricultural land quality dataset available at [magic.gov.uk](#), which reflects the outcomes of field surveying and hence is highly accurate. However, the dataset is very patchy, with data available for only a very small proportion of the Borough (data is typically submitted as part of planning applications). Data is available for several of the sites in question at Berkhamsted showing the land to be of Grade 3b quality (i.e. not BMV), whilst the national dataset shows the land to be of Grade 3 quality. Data is also available for the St Albans part of HGC, showing a fine grained mix of Grades 3a and 3b as well as a small amount of Grade 2 quality land. The national dataset shows Grade 2 land in this area.

6.2.53 In **conclusion**, it is fair to flag agricultural land quality as a likely drawback to strategic expansion to the east of Tring (N.B. detailed work undertaken in support of the planning application confirmed that parts of the site include Grade 2). It may also be the case that Grange Farm, Bovingdon comprises Grade 2 land.

6.2.54 It would not be appropriate to identify a preference for lower growth as neighbouring authorities are mostly subject to a similar (or potentially greater) degree of constraint than is the case for Dacorum Borough.

6.2.55 With regards to significant effects, there is an argument for suggesting a negative effect given the potential scale of BMV agricultural land loss. However, there is no clear guidance in respect of judging the significance as part of local plan-making. The available [guidance](#) focuses on planning applications.

## Landscape

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3	★	★	★	★	2	2	2	2	2	3	3

6.2.56 Dacorum is clearly subject to significant landscape constraints given the Chilterns AONB, areas outside of the AONB but associated with the rolling hills of the Chilterns dip slope (recalling that an AONB boundary review is ongoing) and also land strongly associated with the setting of the AONB, which is a particular issue for Tring and the north west extent of the Borough (i.e. land below the Chilterns escarpment).

6.2.57 The growth scenarios are placed in an order of preference that reflects the following factors:

- **Hemel Hempstead** – HGC is subject to landscape constraint given the adjacent AONB and also noting Green Belt sensitivity (Figure 5.4). Constraint is likely highest at the western extent, where land is strongly associated with the Gade Valley and there are visual connections with the AONB. However, there is a need to consider constraint in the context of the alternative growth locations that would have to come forward in the absence of HGC, both in Dacorum and in St Albans, including potentially under the presumption in favour of sustainable development (given the time it would take to revisit both plans).

The current assumption is that omitting HGC from the plan would necessitate a strategic urban extension to the north west of Hemel Hempstead. This might not involve extending as far as the current AONB boundary, but there is a case for suggesting that the landscape here is more sensitive than the landscape associated with HGC (taken as a whole). This reflects: a dry valley adjacent to the north of the currently identified sites, a cluster of ancient woodlands to the east (with the Gade Valley beyond) and the proximity of Potten End, which is associated with the southern extent of Ashridge. The valley could create a challenge in respect of securing a defensible Green Belt boundary (in the absence of delivering a new country park along the valley, which is not an option that has been suggested).

Finally, Shendish Manor / Fairfields (500 homes under Scenarios 6 – 12) is subject to landscape constraint as it comprises rising land associated with the Gade Valley through which a footpath passes (linking Hemel Hempstead to Kings Langley; potentially a circular walk in combination with the canal).

- **Berkhamsted** – is associated with steep topography that leads to widespread landscape constraint. There may be a landscape argument to be made for the lower growth scenario, i.e. a combination of smaller sites in place of South Berkhamsted, recognising that the latter site is associated with a local high point in the landscape (between the Gade valley to the north and the valley of the Bourne Gutter to the south). However: the site relates well to Berkhamsted in built form terms; the A41 is adjacent; the Chilterns AONB is relatively distant; and it is not clear that there are sensitive views of or across the site.
- **Tring** – there is a clear landscape concern with a strategic expansion to the east of Tring, recognising that Tring is surrounded by the Chilterns AONB and given views across Tring from sensitive high points. There is also a need to consider the experience of those walking along the canal (recognising the popularity of walks linking to the canal arms, Tring Reservoirs and the Chilterns). However, it is recognised that the planning application includes a proposal to deliver significant canal-side parkland.

Dunsley Farm is also subject to a degree of landscape constraint, including recognising its close association with Tring Park. However, it relates well to Tring in built form terms, such that there would be relatively limited impacts to sensitive views of Tring from high points in the Chilterns. Also, it can be seen from Figure 5.4 that there is a degree of *relative* capacity here in Green Belt terms.

Finally, New Mill is thought to be subject to relatively limited landscape constraint, given the potential for a scheme to relate well to the settlement edge. However, there would be a need to further consider the appropriate growth quantum, including with a view to securing a defensible Green Belt boundary.

- **Growth quantum** – as discussed, the Borough is subject to a high degree of landscape constraint. This is likely more significant than the degree of constraint affecting neighbouring local authorities. However, landscape and Green Belt are also key constraints influencing plan-making in neighbouring areas.

- 6.2.58 With regards to **other constant growth locations**, Grange Farm, Bovingdon is subject to fairly limited landscape constraint. As can be seen from Figure 5.4, the site is subject to notably limited sensitivity in Green Belt terms, reflecting strong defensible boundaries on all sides. With regards to the proposed low growth strategy for Kings Langley and Markyate, there are landscape arguments in support of this approach (albeit the effect is to increase pressure for growth elsewhere), as discussed in Section 5.4.
- 6.2.59 In **conclusion**, there are concerns across the board, and a need for further work in respect of measures to avoid and mitigate landscape sensitivities. Concerns are highest under scenarios that omit HGC (Scenario 1) or that involve a strategic urban expansion to the east of Tring (Scenarios 11 and 12).

## Resources

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- 6.2.60 As discussed under the Climate change mitigation topic heading, a key issue is seeking to **reuse existing buildings** ahead of demolition / rebuild as part of the proposed strategy of maximising housing supply from the Hemel urban area, but this supply component is a 'constant' across the scenarios.
- 6.2.61 Another consideration is **waste management**, but it is not clear that any of the sites / growth locations in question are associated with any particular issues or opportunities (there could be an opportunity at HGC).
- 6.2.62 A further consideration is the potential for sterilisation of **minerals resources** that could potentially be viably extracted, with much of the southern part of the Borough intersecting a Brick Clay Safeguarding Area, as understood from the [policies map](#) of the emerging Draft Hertfordshire Minerals and Waste Local Plan. However, it is also important to note that safeguarding is not absolute, as explained by the Minerals Safeguarding Practice Guidance (Mineral Products Association, 2019):

*"Allocation of sites for non-minerals development within MSAs and proximate to safeguarded minerals infrastructure sites should be avoided where possible... However, safeguarding is not absolute. Where other considerations indicate that a proposed site allocation within an MSA is appropriate... [employ] mitigation measures to reduce the... amount of resource sterilised."*

6.2.63 In **conclusion**, it is not possible to differentiate between the alternative growth scenarios with any confidence, and significant effects are not predicted. The County Council may wish to comment further regarding the extent to which the Brick Clay Safeguarding area should be applied as a key constraint.

## Transport

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4	3	2	1	2	3	3	2	3	3	2	3

6.2.64 The growth scenarios are placed in an order of preference that reflects the following factors:

- **Hemel Hempstead** – HGC is distant from Hemel town centre and train station (comparisons can be drawn with [Harlow and Gilston](#) Garden Town). Also, it is noted that the best connected part is potentially the Gade Valley, which is the most sensitive in a number of environmental respects. However, the work completed to date serves to suggest a significant transport opportunity in wide-ranging respects.

A Transport Vision & Strategy for HGC is underway, and once published it will be possible to draw firmer conclusions regarding minimising the need to travel and supporting modal shift. A concern is that a high proportion of journeys would be taken by private car to certain key destinations such as Watford, Luton, Rothamsted Research and BRE. However, these concerns must be placed in context, specifically consideration must be given to a South West Herts growth strategy in the absence of HGC.

With regards to the option of a strategic urban extension to the north west (Scenario 1), there is no clear transport case to be made. Growth would be closer to the town centre and train station, but distance to the M1 corridor is a clear issue and there would not be the potential to utilise the Nickey Line.

Finally, Shendish Manor / Fairfields (500 homes under Scenarios 6 - 12) is strongly supported on account of the adjacent train station. However, on the other hand, access is a clear issue. Shendish Manor is currently accessed via a narrow bridge, and the potential to achieve suitable new points of access to the north and south is unclear. There are also potentially nearby traffic pinch points along the A4251 (London Road), e.g. Rucklers Lane joins the A4251 at the point where the road is crossed by the railway.

- **Berkhamsted** – benefits from very good public transport connectivity, but traffic through the historic town centre is a clear issue; also traffic along Shootersway in the south of the town. As has been discussed, there is a transport argument for a strategy involving South Berkhamsted (only).
- **Tring** – Dunsley Farm benefits from good access to the strategic road network and is also in relative proximity to the train station (located to the east of Tring). New Mill performs less well in both respects, but this is fairly marginal. Land east of Tring is less well linked to the strategic transport network (relative to Dunsley Farm), but potentially marginally the best connected to the train station. Also, as a large strategic site there would be very good potential to support new transport infrastructure, including active travel infrastructure, and also potentially support a new or improved bus service. N.B. it has not been possible to review detailed transport/traffic work undertaken as part of the current planning application (mindful that planning applications / scheme proposals are subject to change).
- **Growth quantum** – as discussed, there is a clear transport argument for avoiding exporting unmet need. Specifically, doing so can be a barrier to early and effective strategic transport planning.

6.2.65 With regards to **other constant growth locations**, Grange Farm, Bovingdon is within ~800m of the village centre and primary school, plus there is some employment at Bovingdon (also, the scheme will deliver community infrastructure that is supportive of the village offer). However, it is unavoidably the case that the scheme will be associated with high car dependency in comparison to the sites discussed above.

6.2.66 In **conclusion**, it is difficult to differentiate between the scenarios, given numerous factors at play. On balance the ranking assigned aims to reflect:

- Support for HGC
- Support for providing for LHN as far as possible

- Support for South Berkhamsted
- Pros and cons in respect of Shendish Manor / Fairfields.

6.2.67 With regards to significant effects, the concern is that not supporting HGC would set back strategic transport planning for the sub-region to a significant extent (potentially by a number of years). Also, 'moderate or uncertain' negative effects are flagged for other scenarios given the need for more work to include transport modelling.

## Water

1	2	3	4	5	6	7	8	9	10	11	12
He											
Be											
Tr											
=	=	=	=	=	=	=	=	=	=	=	=

- 6.2.68 A Water Cycle Scoping Study was completed in 2010 but is now out of date.
- 6.2.69 Water Cycle Studies typically give consideration to: wastewater management (sewer network and capacity at wastewater treatment works (WwTWs); water resources / supply; water quality; and the specific issue of protecting chalk streams (which relates to water quality and water levels). However, it is **wastewater treatment** that is typically a key issue for local plan spatial strategy and site selection, and this is also an issue high on the agenda nationally at the current time. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works, with the other consideration being the biological and chemical capacity of the receiving water course to accept an increase in treated water). However, there are major cost and lead-in time implications, and a risk of unforeseen issues and delays. As such, there is a need to provide the water companies with early certainty regarding growth locations. Also, strategic growth locations can be conducive to planning for strategic infrastructure upgrades (also measures aimed at water efficiency).
- 6.2.70 Further evidence comes from the [Hertfordshire Water Study](#) was published in 2017. Section 8.2 of the 2017 Study deals with Dacorum, giving consideration to strategic interventions needed on the basis of growth assumptions (which are no longer accurate). The Study concludes the following for Dacorum:
- Any development within the Upper Gade catchment by 2031, northwest of Hemel Hempstead, could significantly impact water quality and require sensitive planning.
  - The indicative development areas around Berkhamsted are likely to require strategic intervention from 2031 onwards to accommodate the scale of projected growth within the Berkhamsted STW catchment.
  - The evaluation indicates a large degree of uncertainty in 2051, with the high scenario demonstrating strategic intervention could be required across the district (mainly to improve STW capacity). This scale of intervention could require adaptation of local planning policies and / or construction methods to limit foul flows and promote large-scale water recycling.
  - Focusing growth proposals on Hemel Hempstead could provide a greater number of unrestricted opportunities, utilising the capacity of the existing system and relieving pressure on Berkhamsted.
- 6.2.71 Specifically in respect of WwTW capacity, the study concludes the following for Dacorum: "*All the major STWs in Dacorum are predicted to require focused planning from 2021 onwards to ensure they can accommodate the quantum of growth projected. Under the high scenario, strategic interventions could be needed at all STWs to ensure they have sufficient capacity by 2051, potentially by 2031 for Berkhamsted.*"
- 6.2.72 In light of the above, there is a clear case for flagging a concern with high growth at Berkhamsted and also supporting HGC. As a strategic site, there could be water-related opportunities, including around water infrastructure and securing high levels of water efficiency.
- 6.2.73 Furthermore, there is a need to note the sections of the Hertfordshire Water Study (2017) dedicated to the sub-catchments intersecting the District and also Hemel Hempstead, namely:

- Berkhamsted (Section 9.4) – “*The main trunk sewer and supporting ancillaries are constrained along the valley bottom, which highlights the necessity to consider addressing the source of flow as well as addressing any performance issues, through engineering upgrades to the capacity of the system. The quantum of growth projected around Berkhamsted could also increase foul and treated discharges to the River Bulbourne and its tributaries by 2031. Future upgrades are likely to rely heavily on engineering upgrades although small-scale flow reduction schemes should be considered as part of any works to reduce discharge from CSOs / Berkhamsted STW.*”
- Chesham and Upper Chess Valley (Section 9.6) – no major issues.
- Hemel Hempstead and Bulbourne Valley (Section 9.9) – “*The strategic water infrastructure needs are likely to be short-term water quality, within the upper reaches of the River Gade through into central Hemel Hempstead, and long-term treatment capacity at Maple Lodge STW. Water quality could become a major driver of investment due to the current poor classification of the River Gade (in this location) and the indicative growth areas within the northern area of Hemel Hempstead...*”

6.2.74 With regards to Maple Lodge WwTW (south of Rickmansworth) it is important to note that this serves an extremely large catchment including much of the south east of Buckinghamshire and much of St Albans District. The treatment works is already operating at close to capacity and sometimes gets overwhelmed causing overflows (23 times for a total of 204 hours in 2022, as shown [here](#)). The emerging St Albans Infrastructure Delivery Plan (IDP) explains:

*“The majority of wastewater from the St Albans region is treated at the Maple Lodge... and the treatment works is already operating at close to capacity and frequently gets overwhelmed... The Maple Lodge catchment is very large and covers multiple local authorities, so it is important that growth in St Albans is aligned with growth in the rest of the catchment area to avoid worsening capacity issues at the [WwTW].”*

6.2.75 This serves to highlight a concern, although the IDP also goes on to state: “*During stakeholder consultation in May 2023, Thames Water indicated that neither growth scenario presented will likely cause significant issues on the wastewater network and therefore capacity is expected to be available to support growth.*”

6.2.76 With regards to water quality in the Rivers Bulbourne and Gade, the data shown [here](#) does serve to highlight this as an ongoing concern.

6.2.77 Finally, with regards to **water supply**, this can be a key issue within problematic water resource zones (as established by the work of water companies and the Environment Agency), and it is noted that this issue was a focus of equivalent appraisal work undertaken in support of the Local Plan in 2020. As well as leading to impacts for potable water supply, ‘water stress’ also affects the natural environment; for example (and notably) there is a risk of problematic low flows affecting the internationally important chalk streams that drain the Chilterns within the Borough and elsewhere in the sub-region (Hertfordshire contains 10% of the world’s chalk streams). However, water companies put in place long term plans to balance water supply and demand, and there are not currently any water resource zones that are known to be problematic to the extent that there is a clear constraint to strategic growth.

6.2.78 The District is supplied water by Affinity Water (whilst wastewater is managed by Thames Water), which has a legal requirement to supply water to new developments. Affinity Water has produced a Water Resources Management Plan ([WRMP](#)) which sets out how it plans to provide a reliable, resilient, efficient and affordable water supply to customers whilst protecting the environment. At the core of this is the need to balance the amount of water available for supply with the demand for water. The most recent WRMP covers the period 2020-2080 and identifies a significant supply / demand deficit in the Central Region (which includes Dacorum Borough); which it plans to address through demand management and leakage reduction measures, and through transferring water from neighbouring areas.

6.2.79 In **conclusion**, there are a range of considerations, including a concern with higher growth at Berkhamsted, concerns regarding capacity at Maple Lodge WwTW, and the importance of early strategic planning for growth across the sub-region in support of effective planning for water infrastructure. However, it is not possible to differentiate the growth scenarios with confidence at the current time.

6.2.80 With regards to significant effects, it is appropriate to flag ‘moderate or uncertain’ negative effects at this stage, ahead of receiving consultation responses from the Environment Agency, Thames Water and Affinity Water. Comments on the relative merits of the growth scenarios would be welcomed.

## Appraisal summary

- 6.2.81 The table below present a summary of the appraisal of reasonable growth scenarios presented above. To reiterate, within each row, the aim is to 1) rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then 2) categorise performance in terms of ‘significant effects’ using red / amber / light green / green.

**Table 6.2: The reasonable growth scenarios – summary appraisal findings**

Scenario	1	2	3	4	5	6	7	8	9	10	11	12
<i>Higher/highest growth at...</i>	B-sted Tring	Hemel	Hemel Tring	Hemel B-sted	Hemel B-sted Tring	Hemel	Hemel Tring	Hemel B-sted	Hemel B-sted Tring	Hemel B-sted	Hemel Tring	Hemel B-sted Tring
<b>Topic</b>	<b>Rank of preference and categorisation of effects</b>											
Accessibility	4	2	3	2	2	2	3	1*	2	2	1*	2
Air quality	3	2	2	1*	1*	2	2	1*	1*	3	2	3
Biodiversity	4	3	3	1*	2	3	3	3	3	3	3	3
Climate change adaptation	=	=	=	=	=	=	=	=	=	=	=	=
Climate change mitigation	2	1*	1*	1*	1*	1*	1*	1*	1*	1*	1*	1*
Communities	3	1*	1*	1*	1*	1*	1*	1*	1*	2	2	2
Economy & employment	3	2	2	2	2	1*	1*	1*	1*	1*	1*	1*
Health	=	=	=	=	=	=	=	=	=	=	=	=
Historic environment	3	2	2	1*	1*	2	2	2	2	2	2	2
Homes	8	7	6	6	5	5	4	4	3	3	2	1*
Land & soils	1*	1*	1*	1*	1*	1*	1*	1*	1*	1*	2	2
Landscape	3	1*	1*	1*	1*	1*	2	2	2	2	3	3
Resources	=	=	=	=	=	=	=	=	=	=	=	=
Transport	4	3	2	1*	2	3	3	2	3	3	2	3
Water	=	=	=	=	=	=	=	=	=	=	=	=

6.2.82 The appraisal serves to suggest that **Scenario 1** performs quite poorly overall. This is a low growth scenario whereby the housing requirement might be set at a figure at least 15% below LHN, but is also notably the only scenario whereby the Local Plan is assumed to omit Hemel Garden Communities (HGC). Considerations in respect of Scenario 1 are as follows:

- There are inherent concerns with low growth. Reasons are quite clear cut under the economy, homes and transport headings. Under other headings, concerns with low growth reflect an assumption that unmet housing need that would have to be provided for elsewhere in a constrained sub-region.
- There is broad support for HGC, albeit there are also certain tensions with objectives. Without Dacorum support for HGC it is assumed that not only would significant unmet need be unavoidable, but there would be a need for problematic urban extensions elsewhere. This would lead to a major plan delay, not least to a need to find SANG solutions, giving rise to its own issues. Also, because there would also be a risk of the entire HGC programme failing, the St Albans Local Plan could struggle to progress.

6.2.83 For the **other scenarios** the appraisal shows a mixed picture. In this regard, it is important to be clear that the appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each of the SA topics, such that the intention is not that a numerical approach should be taken to concluding on overall performance. Also, for several topics it is important to note that the appraisal conclusion is finely balanced, such that new evidence could serve to tip the balance of favour.

6.2.84 Having made these overarching comments, the following bullets consider the topic headings in turn:

- Accessibility – as well as HGC, at several other variable growth locations there is an opportunity to deliver strategic community infrastructure alongside new homes (East of Tring; South B'sted; Shendish).
- Air quality – Berkhamsted is potentially the key consideration, with the ranking of the alternative scenarios reflecting support for those scenarios involving allocation of only South Berkhamsted.
- Biodiversity – Scenario 4 involves only sites with a likely SANG solution. SANG for the additional site under Scenario 3 might feasibly be identified and the site is otherwise subject to limited constraint.
- Climate change adaptation – flood risk is often a key climate change adaptation consideration for local plans, but the variable growth locations in question are subject to limited constraint.
- Climate change mitigation – it is not clear that any of the scenarios would lead to a particular built environment decarbonisation opportunity, in the context of ambitious local and national targets.
- Communities – there are wide-ranging factors, but the appraisal reflects a view that there is a case for avoiding the highest growth scenario at both Berkhamsted and Tring.
- Economy and employment – in addition to a clear concern with Scenario 1, which omits HGC, the order of preference reflects support for higher growth at Hemel Hempstead given Herts IQ ambitions.
- Historic environment – Scenarios 4 and 5 perform well because, from a historic environment perspective: HGC represents something of an opportunity; Shendish Manor / Fairfield (Hemel) is subject to a degree of constraint; South Berkhamsted is supported; and there is a degree of concern with Land East of Tring.
- Homes – Scenario 12 would enable the housing requirement to be set at LHN along with a robust supply. Meeting Gypsy and Traveller accommodation needs would be a clear issue in the absence of HGC.
- Land and soils – agricultural land quality is a constraint to any eastwards expansion of Tring. There is not necessarily a preference for lower growth as neighbouring areas are subject to similar constraint.
- Landscape – there are concerns across the board, but concerns are highest under scenarios that omit HGC (Scenario 1) or that involve a strategic urban expansion to the east of Tring (Scenarios 11 and 12).
- Transport – the ranking aims to reflect: support for HGC; support for providing for LHN as far as possible; support for South Berkhamsted; and pros and cons in respect of Shendish Manor / Fairfields (Hemel).
- Water – there are potential challenges, including around WwTW capacity (including at Berkhamsted). However, it is not possible to differentiate between the scenarios with confidence at the current time.

6.2.85 Consultees are encouraged to comment on the merits of the growth scenarios, with a view to supporting efficient plan finalisation. However, it is recognised that consultees will also wish to advocate for scenarios other than those presented above. Equally, it is recognised that consultees will wish to comment on specific sites. Such suggestions / comments should be informed by the discussion in Section 5, which goes through a process to define the 12 growth scenarios that are a focus of appraisal above.

## 7 The preferred approach

- 7.1.1 The aim here is to provide reasons for supporting the preferred scenario in light of the appraisal of reasonable alternatives. The following text was provided to AECOM by DBC officers:

"The preferred scenario is **Scenario 4**, which the appraisal shows to perform reasonably well relative to the alternatives. Scenario 4 gives rise to a degree of tension with certain sustainability objectives, as is inevitable in the context of any local plan, and it is recognised that there are certain arguments in favour of supporting an alternative approach, but Scenario 4 is judged to represent sustainable development on balance. There is good potential to address the identified tensions through policy (see the Draft Plan appraisal below), and adjustments can also be made to the spatial strategy / package of proposed site allocations subsequent to the current consultation, taking into account consultation responses received.

The Council notes that Scenario 4 ranks highest under eight of the sustainability topics, and also performs relatively well under a further two of three topic headings. The Council accepts that the preferred option ranks relatively poorly (albeit comfortably not the worst) in terms of "Homes".

Officers consider the borough to be highly constrained, sufficient to trigger Paragraph 11 (b) of the NPPF. The application of the Habitats Regulations on the Chilterns Beechwoods SAC requires every new dwelling to be supported by appropriate mitigation. Through the preferred strategy, the Council is able to meet c.90% of the standard method for calculating housing need, with a reliance on a combination of Council-led "Strategic SANG" alongside third party bespoke SANG solutions. The appraisal correctly recognises that most of the sites that do not feature within Scenario 4, but feature in other scenarios, currently are unable to identify or secure the necessary mitigation. The Council is equally unable to identify a Council-led Strategic SANG at key locations such as Berkhamsted and Tring. The Council could choose to delay the plan-making process while it seeks to secure additional Strategic SANG solutions in these areas, but timescales for this are unknown as well as any certainty that such SANGs would be secured. The Council notes that continued delay to the plan-making process only serves to stifle housing delivery further, and with that the delivery of other infrastructure considered necessary to unlock growth.

Alternatively the Council could look at one of the few locations where additional bespoke SANG is identified, notably Land East of Tring (considered under Scenario 11 and 12), but this ultimately results in negative effects on the area's valued landscape, including the setting of the Chilterns AONB. Such a scenario would also deliver a disproportionate level of growth at Tring - a key issue that the Council is seeking to respond to in light of the 2020 Emerging Strategy for Growth / Draft Local Plan consultation.

Another reasonable growth scenario that might be considered, in light of the appraisal, is Scenario 8, which seeks to deliver higher growth at Hemel Hempstead. In particular, Scenario 8 performs better than Scenario 4 in relation to "Accessibility". The Council accepts the reasoned justification for this, but notes that growth to the south would be in addition to significant growth to the west (existing allocation with permission), north (via HGC and the north Hemel allocation for 5,500 homes up to 2050) and east (via further allocations proposed through the St. Albans draft Local Plan).

To the south of Hemel, additional growth is already identified in the Two Waters/Apsley area, on brownfield land in close proximity to the train stations and which benefits from frequent buses to key settlements in Dacorum and beyond. Officers remain concerned about the potential for growth at Shendish Manor and the impacts that this could have on the existing junctions with London Road (including via Rucklers Lane and Featherbed Lane), which has a designated Air Quality Management Area.

Officers consider that Scenario 4 represents a balanced approach that will deliver significant new housing alongside key infrastructure while still protecting the borough's most important natural assets."

## **Part 2: What are the appraisal findings at this stage?**

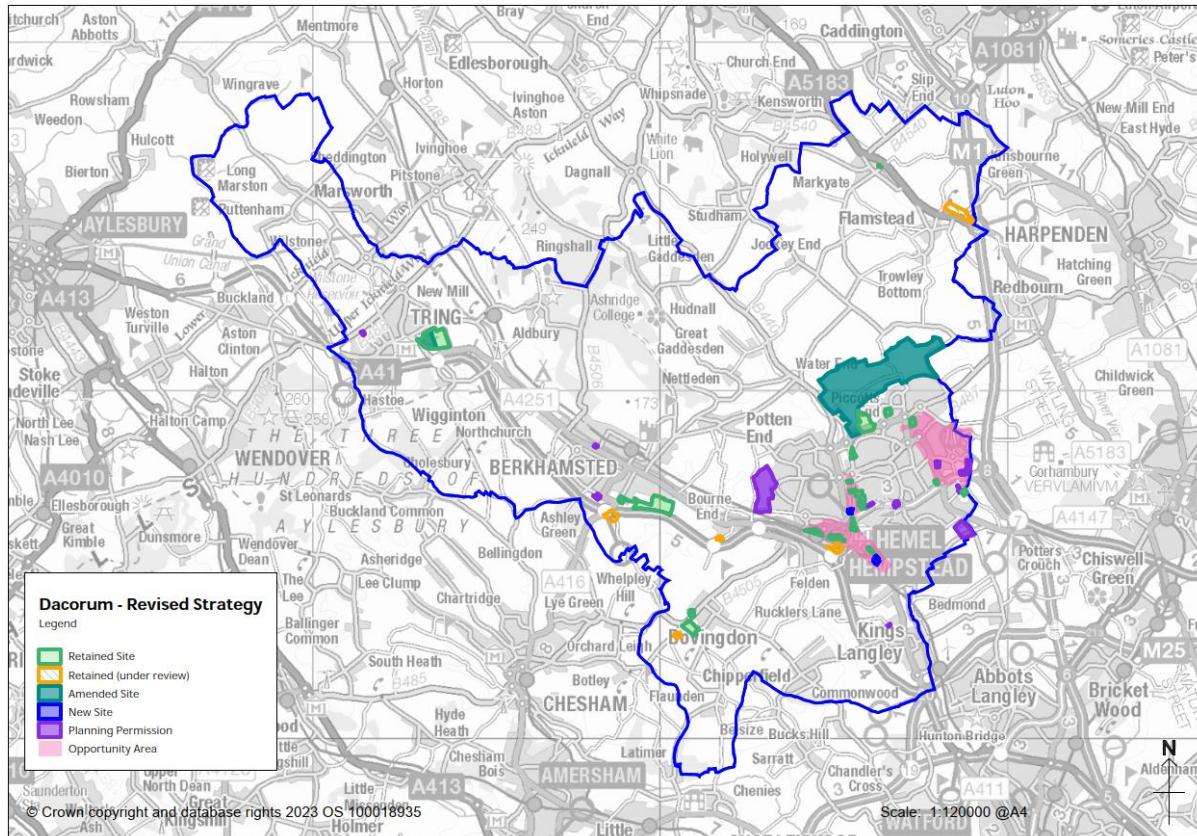
## 8 Introduction to Part 2

8.1.1 The aim of this part of the report is to:

- 1) summarise the appraisal of the revised growth strategy discussed above as Scenario 4;
- 2) summarise the appraisal from 2020 in respect of development management (DM) policy; and then
- 3) bring together these two appraisals to conclude on the emerging plan as a whole.

8.1.2 The figure below shows the revised growth strategy in its entirety (highlighting changes from 2020).

**Figure 8.1: The revised growth strategy**



### Appraisal methodology

8.1.3 Appraisal findings are presented across 15 sections below, with each section dealing with a specific sustainability topic. For each topic the aim is to discuss the merits of the emerging plan as whole, before reaching an overall conclusion on significant effects. Specifically, the regulatory requirement is to "identify, describe and evaluate" significant effects taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. 'long term'. Also, significant effects are defined as follows:

- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan. Also, neighbouring local authorities might have to consider providing for Dacorum's unmet needs.
- The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. on decarbonisation).

8.1.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the emerging plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented and the effect on key 'receptors'

# 9 Appraisal of the emerging plan

## 9.1 Introduction

- 9.1.1 Set out below is an appraisal of the emerging plan as a whole under the SA framework (see Section 3). Under each topic heading the aim is to: 1) summarise the appraisal of the revised growth strategy (Scenario 4 in Section 6); 2) summarise the appraisal from 2020 in respect of development management (DM) policy; and then 3) bring together these two appraisals to conclude on the emerging plan as a whole.

## 9.2 Accessibility (to community infrastructure)

### Revised growth strategy

- 9.2.1 The revised growth strategy performs reasonably well relative to the alternatives appraised above. In particular, HGC represents a major opportunity to deliver housing growth in such a way that opportunities to deliver new strategic community infrastructure alongside new homes are realised. Also, South Berkhamsted will deliver a new primary school (and a secondary school is adjacent); Dunsley Farm will deliver a primary school; and Grange Farm, Bovingdon will deliver community facilities in support of the village centre (but not a primary school). High growth within the Hemel Hempstead urban area warrants ongoing scrutiny in terms of securing community infrastructure alongside homes; and there are not known to be any particular concerns with low growth at Kings Langley or Markyate. Finally, there is a general concern around generating unmet housing need, as there is no certainty regarding the potential for unmet need to be provided for at locations that perform well in terms of accessibility to community infrastructure.

### DM policy

- 9.2.2 The Interim SA Report published in 2020 did not include an ‘accessibility’ topic heading as part of the SA framework, but instead presented a discussion of similar issues/opportunities under ‘sustainable locations’ topic heading. The appraisal flagged a notable ‘uncertainty’ in respect of SP7 Delivering Infrastructure.
- 9.2.3 It remains the case that further work is needed to confirm infrastructure delivery alongside housing growth. This will need to include discussions with the County Council, other strategic partner organisations and site promoters. It is understood that further work will be undertaken in respect of whole plan viability, to inform consideration of how to balance policy priorities that have significant cost implications, including around infrastructure, affordable housing (likely to be a key priority), decarbonisation and other matters, plus there is the context of the Chilterns Beechwoods SAC Mitigation Strategy (see Section 2, above).

### Conclusion

- 9.2.4 In conclusion, whilst the appraisal in Section 6 predicts a ‘neutral’ effect for the revised growth strategy, after having additionally taken account of the emerging development management policy framework it is considered appropriate to predict a **moderate or uncertain positive effect** on the baseline, including recalling that the baseline situation is one whereby housing growth would continue to come forward in a relatively unplanned way. There is a need to account for consultation responses from key organisations, including the County Council, and undertake further work including in collaboration with landowners.

## 9.3 Air quality

### Growth strategy

- 9.3.1 The revised growth strategy performs well relative to the alternatives appraised above. In particular, at Berkhamsted there is support for allocating only South Berkhamsted, which is well located for accessing a secondary school, the town centre and bus services along the London Road, plus facilities will be delivered onsite. As such, there are relatively limited concerns in respect of town centre traffic congestion.

- 9.3.2 With regards to HGC, the site is distant from a train station, but there are clear opportunities to deliver housing growth in a way that supports modal shift away from the private car towards active and public transport, e.g. with the potential to walk to schools and employment and the potential to cycle to Hemel train station (also employment at Harpenden) via an upgraded and extended Nickey Line.
- 9.3.3 With regards to other proposed growth locations: Grange Farm, Bovingdon will lead to some traffic through the Chesham AQMA (within Bucks) and there is a need to note the recently published Chesham Neighbourhood Plan, which proposes significant housing growth within the town. Also, high growth within Hemel warrants scrutiny in terms of parking and traffic congestion. Finally, the proposed low growth strategy for Kings Langley is potentially supported, albeit the village is well-connected by public transport.
- 9.3.4 Finally, with regards to growth quantum, unmet need is not supported as there is no certainty regarding where (or, indeed, if) unmet need would be provided for. Housing need provided for distant from source risks problematic commuting patterns and there is a clear need for early certainty regarding growth quanta / distribution across a sub-region in support of effective strategic transport planning.

## DM policy

- 9.3.5 The Interim SA Report (2020) explained:

*"Policy DM35 – 'Protection from Environmental Pollution' directly supports this objective as new developments would as a minimum maintain air quality standards at AQMAs and any development which is expected to breach objectives for limiting pollutants must demonstrate mitigation or avoidance proposals. Significant positive effects have been identified for this policy in relation to the air quality objective. In addition the policies under the themes of 'Climate Change & Sustainability' and 'Transport'... which encourage the use of more sustainable modes of transport such as walking, cycling and passenger transport over the use of the private car should have a positive effect on reducing pollutants...."*

- 9.3.6 Moving forward, in addition to making every effort to minimise the need to travel and support modal shift away from the private car, there will be a need to consider implications of the revised growth strategy for traffic congestion hotspots that are also associated with 'sensitive receptors' from an air quality perspective, e.g. high streets / town centres. Attention focuses on the Borough's two designated AQMAs, but there is also a need to consider whether there are any further known locations of concern.

## Conclusion

- 9.3.7 In conclusion, a broadly **neutral effect** is predicted. Whilst air quality is improving it is set to remain an issue, including due to particulate pollution associated with electric vehicles. There are some significant constraints to growth locally, but there is also a need to avoid exporting unmet need. It is important to emphasise the importance of proactive local plan-making to enable effective strategic transport planning.

## 9.4 Biodiversity

### Growth strategy

- 9.4.1 The revised growth strategy performs very well relative to the alternatives appraised above, particularly because of the identified SANG solutions. Further considerations are:
- HGC - is strongly supported from a perspective of securing new SANG alongside housing growth, indeed there would be spare capacity to support housing growth within the Hemel urban area. Aside from matters relating to Ashridge/SANG, HGC is supported from a biodiversity perspective. However, there is a need for further scrutiny of the approach to / quantum of growth directed to the Gade Valley area.
  - South Berkhamsted - there is a good degree of confidence regarding that SANG solution, and the site is overall subject to limited constraint. However, there is a small adjacent wooded common, which may functionally link to other woodland within the surrounding landscape, albeit the A41 is a barrier.
  - Dunsley Farm - there is a need to confirm the potential for a SANG as part of the adjacent LWS, e.g. recognising that the value of the LWS could be somewhat tied to a farmed landscape. There are mature historic field boundaries likely to be of biodiversity value.

- Other growth locations - Grange Farm, Bovingdon has a likely bespoke SANG solution and is otherwise notably unconstrained in biodiversity terms; and low growth at Kings Langley is potentially supported from a biodiversity perspective, given the site options in contention for allocation (see Section 5.4).
- Growth quantum – there is a clear theoretical case for low growth in Dacorum given the Ashridge constraint, at least ahead of further certainty regarding strategic and site-specific SANG. However, it is important to note that some locations that could potentially provide for unmet need are also constrained. The simple fact that the 12.6km buffer covers all of Dacorum but only a fairly small proportion of neighbouring authorities means that Dacorum has a particularly clear focus on securing SANG capacity.

## DM policy

9.4.2 The Interim SA Report (2020) explained:

*"Policies DM28 and DM29 provide protection to designated sites and protected/priority species and habitats, whilst Policy DM30 requires the delivery of an overall net-biodiversity gain of 10% and positive measures to support wildlife such as restoring... ecosystems, offsetting to compensate for residual impacts, avoiding creating a negative biodiversity impact and minimising impacts that cannot be avoided.*

*Policies DM31 and DM32 should ensure that development within the plan does not adversely affect the internationally important Chiltern Beechwoods SAC. DM31 would assist in conservation and enhancement of the biodiversity of the Chiltern Beechwoods SAC and DM32 would improve onsite management of visitors to the Ashridge Estate and conserve and protect the biodiversity of this site.*

*DM33 'Protection and Enhancement of the River Character and Water Environment' would have secondary positive effects for biodiversity, as would SuDS provision requirements in 'DM34 - Flood Risk and Protection' and the pollution related environmental protection requirements of 'DM35 - Protection from Environmental Pollution'. The requirements of 'DM36 - Tree retention and Protection' and 'DM37 - Landscaping on Development Sites' will also help to support this objective.*

*... For several of the policies the SA has a finding of 'uncertain effects' given that the effects which will result are dependent on a variety of factors, such as how developments are delivered on a site and the effectiveness of mitigation and enhancement measures."*

9.4.3 Moving forward, one key consideration will be policy requirements in respect of Biodiversity Net Gain (BNG). In some parts of the Country (e.g. Kent) local evidence has been prepared with a view to justifying a 20% BNG requirement, rather than the legal minimum of 10% BNG. The Kent context is discussed within a recent report prepared by the Essex Local Nature Partnership available [here](#). Also, in Surrey it is noted that the adopted Guildford Local Plan now requires 20% BNG. There is also a need to consider how to target offsite biodiversity enhancement measures undertaken under the BNG regime, informed by a strategy that ensures that investment / intervention is directed to priority areas. In particular, there is a need to account for the emerging Hertfordshire Local Nature Recovery Strategy (LNRS; discussed [here](#)).

9.4.4 Finally, with regards to HGC, it is understood that "a Green Network" as one of four key pillars, which is supported, from a biodiversity perspective. However, proposals are currently somewhat high-level. Moving forward it is recommended that work is undertaken to demonstrate that biodiversity issues are being addressed, and opportunities fully realised, through masterplanning, and also that consideration is given to requiring more than the national minimum 10% biodiversity net gain.

## Conclusion

9.4.5 In conclusion, there is a clear support for proactively directing growth to sites with an identified SANG solution, and the proposed allocations are otherwise subject to limited biodiversity constraint. As such, it is appropriate to predict a **moderate or uncertain positive effect** on the baseline. There is a need for further collaboration with key partner organisations, such as Natural England and the local Wildlife Trust, not only in respect of SANG but also, more widely, to ensure that the spatial strategy supports biodiversity net gain as measured at landscape scales and with a long term perspective.

## 9.5 Climate change adaptation

### Growth strategy

- 9.5.1 As discussed in Section 6, a key consideration is the need to avoid development - in particular new homes - encroaching on flood risk zones. Overall flood risk constraint is limited across the proposed growth locations, but considerations include:
- HGC - is primarily associated with raised ground subject to limited flood risk, although there are significant surface water flood risk channels that would need to be accounted for as part of the green/blue infrastructure strategy, and there is also a need to ensure no increases to surface water flows reaching the River Gade, given significant downstream areas of flood risk.
  - South Berkhamsted and Dunsley Farm, Tring – are both notably subject to limited flood risk.
  - Other constant growth locations - a key consideration is Grange Farm, Bovingdon, which is associated with a significant surface water flood channel, which impacts homes and the village centre downstream. Detailed work has been undertaken to explore the issue, and the potential for development to achieve a flood risk ‘betterment’ has been explored. A clear implication is the need to retain sufficient space within the site for blue / green infrastructure.
  - Markyate – low growth is supported from a flood risk perspective, as fluvial flood risk is a significant issue for the one Green Belt site in contention for allocation to deliver higher growth (see Section 5.4).
  - Kings Langley – a somewhat similar situation to Markyate, given the close association of one of the sites in contention for allocation (Rectory Farm) with the River Gade corridor; however, likely less clear cut.
  - Hemel Hempstead urban supply - overheating is a climate change adaptation / resilience consideration (e.g. there is a need to ensure sufficient space for urban green infrastructure that provides shading). Also, there is also a need to scrutinise urban supply from a flood risk perspective, recognising that some existing low intensity land uses in urban areas (e.g. employment, commercial, car parking) may reflect flood risk. However, housing-led redevelopment of urban sites subject to flood risk is not uncommon nationally, given good potential to mitigate flood risk, including through: avoiding vulnerable uses on the ground floor; measures to ensure safe access / egress; flood resistant / resilient design.

### DM policy

- 9.5.2 The Interim SA Report (2020) explained:

*“Policy DM34 – ‘Flood Risk and Protection’ should ensure that development: does not take place in Flood Zones 2 or 3 unless it is for a compatible use; does not result in increased flood risk elsewhere; and incorporates flood resistant and resilient measures. The policy should also ensure that any SuDS will be maintained throughout the lifetime of a new development. A significant positive effect [is] identified...”*

*“In addition, Policy SP10 – ‘Climate Change Mitigation and Adaptation’ requires that development avoids areas of flood risk and that green infrastructure is used to reduce flood risk, whilst the Masterplans for delivering the Place Strategies will require the provision of comprehensive green infrastructure networks and in so doing will help to reduce overall flood risk.”*

- 9.5.3 Moving forward, in addition to flood risk another policy consideration relates to overheating risk, with some emerging local plans nationally proposing detailed policy. For example, the emerging Uttlesford Local Plan requires: *“All development proposals must demonstrate how the cooling hierarchy has been integrated into design decisions, via the Climate Change & Sustainability Statement. Major development proposals are encouraged to use the CIBSE (Chartered Institute of Building Service Engineers) standards: TM52 for non-residential development; and TM59 for residential development.”*

### Conclusion

- 9.5.4 In conclusion, a **neutral effect** is predicted. Flood risk can be a key issue for some local plans but is not a major issue for the current proposed local plan (subject to consultation with the Environment Agency, who might also alert the Council to any potential development-related opportunities for strategic flood water attenuation). There are range of other important climate change adaptation / resilience considerations, but these are appropriately considered under other topic headings.

## 9.6 Climate change mitigation

### Growth strategy

- 9.6.1 A detailed introductory discussion of the issues / opportunities is presented in Section 6, which is not repeated here for reasons of brevity, but suffice to say that the question of whether the revised growth strategy will serve to ensure that built environment decarbonisation opportunities are fully realised warrants further consideration. Specific considerations include:
- HGC - likely represents a considerable decarbonisation opportunity (although further work is needed). Large masterplanned schemes can be associated with particular opportunities in respect of onsite operational net zero emissions (and potentially even net positive, i.e. a net exporter of electricity to the grid), including given the potential for strategic battery storage. However, national understanding in respect of the nature of these opportunities is not well advanced. There could also be an opportunity to minimise embodied and other 'whole life cycle' emissions, including feasible via support for modern methods of construction. The Hertfordshire Growth Board is seeking to place the County at the forefront of "[offsite manufacture](#)" practice nationally, building on Hertfordshire's heritage as a "cradle for continuous experiment in the making of cities". It could well be the case that support for HGC, in combination with strategic growth locations elsewhere in the sub-region, helps to build a business case for an Modern Methods of Construction (MMC) facility.
  - South Berkhamsted - the scale and mix of uses onsite (also adjacent) could suggest an opportunity, but site promoter materials received to date do not suggest any particular net zero ambition or opportunity.
  - Dunsley Farm – is not known to be associated with any particular built environment decarbonisation issues or opportunities. The onsite / adjacent use mix could suggest an opportunity, but the proposal to provide a significant amount of land for non-housing uses could have viability implications.
  - Grange Farm, Bovingdon - is the subject of a current planning application for a higher density scheme than assumed here ([ref. 23/02034/MFA](#)), which is a viability consideration. The submitted Sustainability Statement discusses the potential to go significantly beyond the requirements of Building Regulations but does not discuss offsetting to achieve net zero.
  - Hemel urban supply – warrants scrutiny from a built environment decarbonisation perspective (but is broadly supported from a transport decarbonisation perspective). High density urban sites can give rise to inherent opportunities, potentially to include supply of heat via a heat network (particularly where there is a fine grained mix of uses); however, development viability can be challenging, which can limit the potential for an ambitious approach to operational net zero development (just as it can hinder the ability to deliver affordable housing). There is also a need to consider embodied emissions, and particularly the extent to which there would be support for reuse of buildings ahead of demolition and rebuild.

### DM policy

- 9.6.2 The Interim SA Report (2020) explained the following (N.B. the appraisal considered both transport and built environment decarbonisation in the round):

*"Significant positive effects have been identified against this objective for Policy SP10 – 'Climate Change Mitigation and Adaptation' and the associated DM policies... as they include a wide range of requirements which are directly related to the reduction in greenhouse gas emissions and adaptation to climate change.*

*Significant positive effects have also been identified against this objective for the policies under the 'Transport and Connectivity' theme, as follows. Sustainable Transport Strategies have been developed for Hemel Hempstead, Berkhamsted and Tring which aim to make the transport network more attractive for walking and cycling and improving access to public transport. DM51 – 'Supporting and protecting land for transport interventions' will help to enable sustainable transport interventions... DM50 – 'Transport and Movement', DM52 – 'Movement and Access' and DM53 – 'Walking and Cycling' all focus on reducing the need to travel overall and also ensure that transport is accessible to all user groups, prioritising the movement of pedestrians and cyclists. DM54 – 'Public Transport' encourages the use of public transport by ensuring that public transport is convenient and safe. By reducing the need to travel and encouraging alternative modes of travel other than the car, the growth in greenhouse gas emissions may be reduced. DM51 requires sustainable transport measures to be delivered early on in the delivery of new developments which will help to enable sustainable travel behaviours from the outset.*

*Further significant positive effects have been identified in relation to the Hemel Hempstead Delivery Strategy policies as the delivery strategy and its supporting policies include a wide range of requirements which would result in positive effects in terms of mitigation and adaptation to climate change. These include the requirement for high densities of development in the most sustainable locations, as well as mixed-use developments, which will reduce the need to travel and the provision of infrastructure for sustainable modes of travel and the requirements to deliver integrated and accessible developments with walking, cycling and public transport prioritised – in line with the requirements of the Hemel Hempstead Sustainable Transport Strategy. The level of impact on this objective will however be dependent on the level of behavioural change that would be required to make use of the sustainable travel modes... In addition, the provision of significant levels of new employment space... will reduce the need to travel to access employment opportunities – thereby reducing associated growth in greenhouse gas emissions. The strategy and its supporting policies also place considerable emphasis on reduced energy consumption in new developments and the delivery of sustainable energy and power infrastructure...*

*Positive effects have been identified for the Berkhamsted and Tring Delivery Strategies, which in line with Garden City Principles... would ensure that new developments promote sustainable travel choices and deliver integrated and accessible development with walking, cycling and public transport prioritised... The requirements relating to generating energy from renewable and low carbon sources and delivering other significant environmental enhancement to ensure climate resilience would also support this objective.*

*Other positive effects relating to climate change mitigation and adaptation could arise as a result of the policies under the 'Environment and Biodiversity' theme, for example through the requirements of policies DM36 – 'Tree Retention and Protection' and DM37 – 'Landscaping on Development Sites' which require new development to incorporate new trees and landscaping. The Masterplans for delivering the Place Strategies will require the provision of comprehensive green infrastructure networks...*

*... The requirements of policies 'SP5 Delivering the Employment Strategy' and 'SP6 Delivering the Retail and Leisure Strategy' should also help to reduce the growth in emissions through their requirements to retaining and develop existing employment land, expand employment opportunities in the Borough and through the provision of new neighbourhood and local centres to reduce the need to travel."*

- 9.6.3 Moving forward, a key built environment decarbonisation consideration is around ensuring that 'net zero development' is carefully defined. There are perhaps three key points to make. Firstly, any approach to net zero development must align with the **energy hierarchy**, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Secondly, there are two broad approaches to calculating and monitoring / evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an **energy-based approach**. The two approaches are compared and contrasted in a recent report [here](#).<sup>14</sup> Thirdly, it is important to ensure a focus beyond 'operational' energy/carbon, i.e. the energy used / carbon emitted as a result of the development's occupation / use. Additionally, there is a (crucially important) need to consider the '**whole life cycle**' of a development, to include the emissions associated with construction, maintenance, retrofitting and demolition.
- 9.6.4 A number of adopted and emerging local plans nationally apply the energy based approach within built environment decarbonisation / net zero development policy. The emerging Uttlesford Local Plan is commended as a best practice example. As well as ensuring a cutting edge approach to setting policy requirements, there is also a need to ensure a focus on conciseness and accessibility, to the benefit both of planning applicants and also interested members of the public seeking to understand the role of the Local Plan in terms of contributing to national and local net zero targets.

## Conclusion

- 9.6.5 In conclusion, a **moderate or uncertain negative effect** is predicted on the baseline, accounting for established objectives and targets. The emerging plan would likely see an improvement on the baseline, but there is also a need to reach conclusions taking account of established objectives and targets.

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<sup>14</sup> Under the Building Regulations methodology the question for any given planning application is the extent to which the development can exceed the regulatory requirement, measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m<sup>2</sup>/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter.

- 9.6.6 In particular, whilst the Borough's net zero target date is 2050 there is a need to account for the clear commitment within the Draft Local Plan (2020) to ensure that all development comes forward as 'net zero development' by 2030. In this light, predicting positive effects of any significance involves a high bar.
- 9.6.7 It is hoped that it will be possible to predict significant positive effects at the next stage (Regulation 19); however, at this current stage there is insufficient evidence of built environment decarbonisation being integrated as a key factor with a bearing on spatial strategy and site selection to the extent that there can be confidence in respect of achieving net zero development. There is a need for further work to confirm particular spatial strategy, site and scheme-specific decarbonisation opportunities.

## 9.7 Communities

### Growth strategy

- 9.7.1 The revised growth strategy performs broadly well relative to the alternatives. Considerations include:
- HGC – represents an opportunity in two key respects. Firstly, there is a clear commitment to delivering the scheme in line with garden community principles, including with a focus on: stakeholder engagement; community stewardship; and delivering infrastructure alongside new homes, including community infrastructure (as discussed), transport infrastructure (including active travel; also good bus services) and green infrastructure (see the maps presented in Section 5.2). Secondly, the clear intention is for HGC to support regeneration of nearby existing local centres, thereby helping to address existing hotspots of relative deprivation, plus HGC is supportive of regeneration within the Town Centre and Two Waters Opportunities Areas, including via SANG provision.
  - South Berkhamsted – represents a good opportunity to deliver housing growth in a way that minimises local community concerns. However, noise pollution from the adjacent A41 is an issue.
  - Dunsley Farm – gives rise to limited concerns and will deliver benefits to the town.
  - Grange Farm, Bovingdon – is notably supported in principle by the Parish Council.
  - Hemel urban supply – a primary consideration is potentially a need to maximise urban supply in order to minimise pressure on the Green Belt, which is often an issue of paramount importance to local communities. Also, maximising urban supply from the two Hemel Opportunity Areas aligns with established regeneration objectives, including as set out within the Hemel Town Centre Vision (2023), which notably proposes numerous redevelopment opportunity sites over-and-above those assumed under the current growth scenarios. However, there is also a need to consider potential tensions between high / higher density urban redevelopment and communities objectives.
  - Growth quantum – there is the potential for unmet need from Dacorum to lead to pressure for unpopular urban extensions elsewhere within a constrained sub-region. It could feasibly be that the South West Herts Joint Strategic Plan identifies one or more new settlement options, equally it might be the case that new settlement options are identified close to Dacorum through the Buckinghamshire Local Plan (which is currently at the early stages of preparation), but there is no certainty at the current time.

### DM policy

- 9.7.2 The Interim SA Report (2020) explained the following under the 'community cohesion' heading:
- "The plan includes policies which would improve access to education, facilities, public transport and would improve quality of life in the Borough whilst helping to reduce crime and deprivation. There is uncertainty about what infrastructure will be provided to support this objective and whether the infrastructure will be sufficient to mitigate against pressure on existing services and facilities.*
- Policies which give consideration to the design of new development and the preservation of local character would play a part in improving quality of life by making the Borough an attractive place to live. SP13 – 'Delivering High Quality Design' and its supporting DM policies... directly support this objective by developing the Borough to be a 'place for all' which integrates and includes people from all backgrounds and requires high quality design and design to reduce the opportunity for crime and fear of crime itself.*

*... Positive effects are identified against SP8 – ‘Neighbourhood Planning’ which would help ensure that the needs of each neighbourhood are met and SP4 – ‘The Housing Strategy’ which also supports this objective by requiring that a mix of housing which meets the needs of all residents and the potential for new community facilities to be integrated into larger development sites.*

*Policies which support development of houses, retail and employment sites in sustainable locations, such as SP2 – ‘Spatial Strategy for Growth’, SP5 – ‘Delivering the Employment Strategy’ and SP6 – ‘Delivering the Retail and Leisure Strategy’, would support this objective by ensuring residents have access to facilities. This is further supported by ‘Sustainable Transport and Connectivity’ theme policies and SP10 – ‘Climate Change Mitigation and Adaptation’ which would improve accessibility by providing public transport or sustainable transport to link communities with services.*

*Policies which support high quality design and liveable neighbourhoods, good access to transport and connectivity between services, and the provision of those services, when combined create an overall positive assessment against the objective for community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime.*

- 9.7.3 Moving forward, it is recommended that careful consideration is given to development management policy in respect of noise pollution. Also, account should be taken of the latest national context in respect of good design outcomes and process. The emerging Uttlesford local plan is again commended as a good practice example, in that it requires the development proposals can clearly demonstrate compliance with the most up-to-date version of the local design code and demonstrate that ten defined characteristics are addressed. Also, for schemes of 100 dwellings or more applicants are required to “*make use of a Design Review as early in the process as possible...*” The emerging St Albans Local Plan is another good practice example, with detailed design guides having been prepared for all of the strategic allocations.

## Conclusion

- 9.7.4 In conclusion, a **moderate or uncertain positive effect** is predicted. HGC is supported as is the reduced growth strategy for Berkhamsted and Tring relative to the proposal in 2020. Also, there is simply the need to adopt a Local Plan in order to prevent sub-optimal piecemeal growth with likely infrastructure deficiencies. However, there are wide ranging issues that will require further consideration ahead of plan finalisation, including issues to be addressed by DM policy informed by whole plan viability work.

## 9.8 Economy and employment

### Growth strategy

- 9.8.1 The revised growth strategy performs broadly well relative to the alternatives, although there is a preference for a higher growth strategy. A key consideration is that support for HGC will support / enable the expansion of Maylands Business Park (into St Albans District), which is a core component of Herts IQ.
- 9.8.2 By way of context, it is important to note that the Draft Local Plan (2020) was unable to provide for employment land needs in full, explaining:
- “Accommodating the Borough’s indicative floorspace growth figures for office and industrial space is very challenging... Indeed, our shortfalls are now larger than stated in the Economic Study Update, as explained in the Economic Development Topic Paper... Given this, we asked the other South West Hertfordshire authorities if they could take our unmet need. Dacorum and St Albans councils are working together to ensure that most of our unmet need will be accommodated on the East Hemel Hempstead site in St Albans City and District. This site is ideally located, as it will act as an **extension to Maylands Business Park**. It also forms the principal development opportunity in the Herts IQ Enterprise Zone.”*
- 9.8.3 The St Albans Draft Local Plan (2023) confirmed this approach, explaining the following in respect of the proposed employment land strategy supported by the plan: *“Due to these locations providing an agreed oversupply for St Albans District’s own needs, the excess will assist Dacorum Borough and potentially other South West Herts local authorities in meeting some of their employment requirements.”*
- 9.8.4 With regards to specific growth locations:

- HGC - is crucially important because, were the programme to fail, then it could prove challenging to deliver a strategic extension to Maylands Business Park, including because taking forward HGC in its entirety is likely important for securing strategic road infrastructure upgrades.
- Dunsley Farm - would deliver new employment land that will add to the local employment offer at Tring and assist (modestly) with closing the gap to the established borough-wide need figure.
- The employment land allocations within the Draft Local Plan (2020; introduced in Box 5.11) - are all currently under review and a final decision will be made at the next stage of plan-making. From an 'economy and employment' perspective there is a clear case for allocation in order to close the gap to the established need figure, and also with a view to providing local employment opportunities.
- Growth quantum – there is a need to deliver homes in support of the local and subregional economy. Supporting the success of Herts IQ is a key consideration, but Luton and Aylesbury are also employment and economic growth hubs of at least regional importance.

## DM policy

- 9.8.5 The Interim SA Report (2020) explained:

*"The DM policies under SP5 (DM16 – 'General Employment Areas' and 'DM17 – Other office and industrial sites')... support... economic objectives by requiring the development, redevelopment or retention of employment sites in the Borough. By securing a number of sites as General Employment Areas, the policies would ensure the Borough has a good number of employment opportunities and secures its role as an important economic centre.*

*The delivery strategies for the Borough's settlements are assessed as having positive effects against the economic objectives, with these effects being considered as significant for the Hemel Hempstead and Tring Delivery Strategies due to the levels of employment development which they propose. Positive effects have also been identified for SP11 – 'Development in the Green Belt' and SP12 – 'Development in the Rural Area'. These positive effects arise from the policies protecting and expanding areas for retail and/or employment opportunities, which would bring economic benefits.*

*Policies which attract people to live in or visit the Borough by ensuring it is a pleasant place to be will support the economic objectives. Residents and visitors to the Borough would help support the vitality and viability of the local economy through increased spending and utilisation of local facilities.... The policies under SP13- 'Delivering High Quality Design' would support this...*

*... In combination, the policies would support the economic objectives by providing the housing and employment options necessary to live there, and by providing the infrastructure to enable transport around the Borough. The vitality and viability of the Borough is helped by the numerous policies which ensure retail, leisure and employment space is retained."*

## Conclusion

- 9.8.6 In conclusion, a **moderate or uncertain positive effect** on the baseline is predicted, having accounted for the proposed DM policies framework. There is strong support for HGC; however, there is a need for further work in respect of employment allocations in order to close the gap to the identified need.

## 9.9 Health and wellbeing

- 9.9.1 It is difficult to comment beyond points discussed under other topic headings. The Interim SA Report (2020) concluded as follows:

*"Overall, the predicted impacts of the plan should have positive cumulative impacts against the objective to improve the health and wellbeing of the local population. This is achieved through policies which support the improvements to housing, healthcare, education, the environment and facilities for leisure and recreation. However, uncertainties do exist, arising from the pressure which would be placed on existing facilities as a result of increased housing and population; the unknown nature of the infrastructure that will be delivered to support growth...."*

*Significant positive effects have been identified against the Development Management policies relating to the 'Healthy Communities' theme... These policies would implement a range of measures to prioritise the health and wellbeing of residents, ensuring access to healthcare facilities and mitigating against negative impacts by requiring a Health Impact Assessment be carried out for new developments. The policies require that sport and leisure facilities be retained, and additional facilities provided. This would ensure residents have the opportunity to engage in healthy activities. Similarly, the provision of new open space alongside development will enable residents to engage in outdoor recreation...*

*Facilitating active travel and outdoor recreation would benefit the health and wellbeing of residents by encouraging people to take part in healthy activities. SP2 – 'Spatial Strategy for Growth' provides positive impacts against the health and wellbeing objective by focusing development in the most sustainable locations in the Borough, thereby providing opportunities for physical activity by providing walkable and cyclable neighbourhoods. SP10 – 'Climate Change Mitigation and Adaptation' encourages the use of sustainable transport modes at new developments which could embed sustainable travel from the outset and the policies under the 'Sustainable Transport and Connectivity' theme further supports this. The 'Environment and Biodiversity' theme policies and SP12 – 'Development in Rural Area' encourage outdoor recreation through the provision of new open space and maintenance of the rural area and outdoor visitor sites such as the Ashridge Estate...*

*Policies which support the wellbeing of residents are included in the plan. A sufficient mix of quality housing, supported by SP4 – 'The Housing Strategy', as well as DM1 – 'Mix of Housing'; DM12 – 'Nationally Described Space Standards'; and DM10 – 'Accessible and Adaptable Homes', would reduce overcrowding and stress related to inadequate housing conditions and SP8 – 'Neighbourhood Planning' would help ensure that the needs of each neighbourhood are met. Policy SP13 – 'Delivering High Quality Design' will have positive effects on the wellbeing of residents by conserving the attractiveness of the Borough and designing with consideration for the reduction of crime. The 'Environment and Biodiversity' theme policy DM35 – 'Protection from Environmental Pollution' gives consideration to the reduction of air and noise pollution which further supports this objective. SP5 – 'Delivering the Employment Strategy' requires that employment opportunities in the Borough are supported; by providing employment opportunities for all, the plan supports the objective to narrow the income gap between the poorest and wealthiest parts of the area, thereby reducing the health differential.*

*Positive effects have been identified in relation to renewable and low carbon energy proposals, as DM25 – 'Stand-alone renewable or Low Carbon Energy' requires that any harm to residential or local amenity, including air quality, noise and light flicker is not substantial.*

*The plan includes policies which encourage healthy lifestyles through the provision or protection of facilities, open space and active travel infrastructure. The plan also supports residents' wellbeing through the provision of sufficient, safe accommodation, access to facilities and jobs, and minimising environmental pollution. However, the realisation of these potential health benefits is dependent on individuals' behavioural choices to adopt healthy lifestyles, and the actual infrastructure identified in the Council's Infrastructure Delivery Plan to facilitate healthy choices."*

- 9.9.2 One point to note is that the appraisal in 2020 raised a concern regarding the need to relocate sports facilities in Berkhamsted in order to accommodate housing, which is no longer an issue.
- 9.9.3 In conclusion, a **moderate or uncertain positive effect** on the baseline is predicted, having accounted for the proposed DM policies framework.

## 9.10 Historic environment

### Growth strategy

- 9.10.1 The revised growth strategy performs well relative to the alternatives. Considerations include:
  - HGC - overall represents a good opportunity to direct growth to an area with fairly limited historic environment constraint, reflecting the fact that this was a historically rural area prior to development of Hemel Hempstead as a mid-20<sup>th</sup> Century new town. However, the Gade valley at the western extent of HGC is a historic transport corridor, associated with two conservation areas. Other considerations include encroachment on farmsteads and wider impacts on a historic farmed landscape.

- South Berkhamsted – performs well but there is a residual concern regarding traffic through Berkhamsted town centre.
- Dunsley Farm, Tring - is in close proximity to Tring Conservation Area and Grade II listed Tring Park Registered Park and Garden is adjacent. However, it is not clear that the land in question contributes significantly to the setting of the conservation area or the parkland, and the site benefits from good access to the A41, such that there are limited concerns regarding traffic through the town centre.
- Grange Farm, Bovingdon - is subject to fairly limited historic environment constraint, although a Grade II listed building is adjacent to the north and the historic hamlet of Bovingdon Green is also adjacent.
- Hemel town centre - there are perhaps limited historic environment constraints to growth relative to many other town centres; however, it is important to note that [historic mapping](#) shows extensive built form around the town centre area (i.e. extending far beyond Hemel Old town) as well as extensive industry and other built form in the Two Waters area (some of it relating to its paper making heritage). The Old Town proposed allocation (90 homes) is another consideration, although it is an existing allocation.

Also, the ‘new town’ character gives rise to sensitivities. It is noted that Historic England objected to the Market Square allocation in 2020 on the basis that the site forms part of the setting of the Water Gardens and the New Town’s urban design and supports Sir Geoffrey Jellicoe’s original design intentions. The intention remains to allocate this site, but steps can be taken to address heritage concerns.

## DM policy

- 9.10.2 The Interim SA Report (2020) explained:

*“Under the ‘Delivering Great Places’ theme the Draft Local Plan includes policies which will help to support this objective and significant positive effects have been identified for these policies. Policy DM41 – ‘Height of Buildings’ requires that the height of new buildings should reinforce and enhance local character and no development would adversely affect conservation areas or listed buildings; a principle which is echoed in DM46 – ‘Conservation Areas’ and DM47 – ‘Listed Buildings’.*

*The protection and enhancement of the historic environment is emphasised under DM43 – ‘Historic Environment’... [and policies that] seek to protect those heritage assets which are non-designated and those of archaeological interest, ensuring that no assets are lost or damaged by development. The Borough includes a number of Conservation Areas and developments in or near these areas would be permitted only if they preserve or enhance the character and appearance of the area under DM46...”*

*For several of the policies the SA has a finding of ‘uncertain effects’ given that the effects which will result are dependent on a variety of factors, such as how developments are delivered on a site and the effectiveness of mitigation and enhancement measures. None of the site allocations have been identified to have any significant heritage-related constraints but the majority have some associated or nearby heritage assets that will need to be taken into consideration during the planning application process.”*

- 9.10.3 Moving forward, it will be important to consider locally distinct policies, noting that the Government has committed to publishing a set of [national development management policies](#). There will also be a need for further consideration of any development management policies that could potentially conflict with historic environment objectives, e.g. policies in support of net zero development or the rural economy.

## Conclusion

- 9.10.4 In conclusion, whilst there are unavoidably tensions with historic environment objectives, a broadly **neutral effect** is predicted, including because: HGC represents something of an opportunity in respect of minimising tensions between growth and the historic environment (subject to ongoing work on the Gade valley); and there is support for the proposed allocations at both Berkhamsted and Tring. It is recognised that there will be a need to revisit conclusions following consultation with Historic England, as well as following detailed work to develop site specific policy.

## 9.11 Homes

### Growth strategy

- 9.11.1 The appraisal in Section 6 identifies a clear preference for higher growth under this topic heading.
- 9.11.2 The headline consideration is the housing requirement that can be set given the identified supply and given a need for supply to exceed the requirement (a 'supply buffer'). In this regard, the proposal is to set the housing requirement below Local Housing Need (LHN) – thereby generating unmet need – and there is a need for further work to confirm the supply buffer. It is important to note that additional supply may be identified prior to plan finalisation.
- 9.11.3 A range of other key considerations are discussed in Section 6, and not repeated here for reasons of brevity. These include matters relating to: delivery risk, timing of delivery, the geographical spread of supply, affordable housing and Gypsy and Traveller accommodation needs.

### DM policy

- 9.11.4 The Interim SA Report (2020) explained:

*"Policy SP4... contributes to meeting the sub-objectives of providing a range of housing types, size and tenure, including high quality affordable and key worker housing that meet the needs of all communities with the Borough, meeting the needs of the gypsy and traveller communities, and helping to reduce homelessness. [Also] SP11 – 'Development in the Green Belt', SP12 – 'Development in the Rural Area' and SP29 – 'Delivering Growth in the Countryside' support housing development, albeit limited levels, in the Green Belt, Rural Area and Countryside..."*

- 9.11.5 Moving forward it is understood that a key focus will be on developing a best practice affordable housing policy, including with a focus on 'genuinely affordable' housing, e.g. available for 60% market rent. It will be important to ensure that the spatial strategy / package of proposed allocations is supportive of affordable housing ambitions by ensuring that development is directed to locations with strong viability.
- 9.11.6 Other key policy areas for further consideration will relate to: Standards for New Residential Development (including requirements in respect of wheelchair accessibility, i.e. M4(2) compliance); Specialist Housing (e.g. strategic housing sites might be expected to provide extra care dwellings as part of the overall mix); and Custom and Self-Build Housing (e.g. proposals for 100 or more dwellings might be expected to provide serviced plots, recognising that self-build homes are another route to achieving home ownership).

### Conclusion

- 9.11.7 In conclusion, there is an unavoidable need to predict a **significant negative effect** under this topic, given the proposal to set the housing requirement below LHN and so generate unmet need, and given little certainty regarding where, when or even if unmet need will be provided for within a constrained sub-region.

## 9.12 Land and soils

### Growth strategy

- 9.12.1 The appraisal above finds the revised growth strategy to perform broadly well relative to the alternatives. A number of the proposed allocations will undoubtedly comprise 'best and most versatile' agricultural land, and potentially higher quality (grade 2) land, but it is difficult to envisage a better performing alternative.
- 9.12.2 It is noted that the previous Interim SA Report (2020) recommended: "*Providing greater emphasis on the importance of the Borough's soil resource, in particular areas of best and most versatile agricultural land – both at a strategic level and in relation to settlements and sites (as appropriate).*" The revised growth strategy does align with this recommendation, notably through a reduced focus of growth at Tring.

### DM policy

- 9.12.3 Loss of agricultural land is not a matter that lends itself well to being addressed via DM policy.

## Conclusion

- 9.12.4 In conclusion, a broadly **neutral effect** is predicted. There is an argument for suggesting a negative effect given the potential scale of best and most versatile agricultural land loss. However, there is no clear guidance in respect of judging significance. The available [guidance](#) focuses on planning applications.

## 9.13 Landscape

### Growth strategy

- 9.13.1 This is a key issue locally (see discussion in Sections 5 and 6), hence it is important to note that the revised growth strategy performs well relative to the alternatives. Considerations include:

- HGC – is subject to landscape constraint given the adjacent AONB and also noting Green Belt sensitivity (Figure 5.4). Constraint is likely highest at the western extent, where land is strongly associated with the Gade Valley and there are visual connections with the AONB. However, there is a need to consider constraint in the context of the alternative growth locations that would have to come forward in the absence of HGC, both in Dacorum and in St Albans, including potentially under the presumption in favour of sustainable development (given the time it would take to revisit both plans).
- South Berkhamsted – relates well to Berkhamsted in built form terms; the A41 is adjacent; the Chilterns AONB is relatively distant; and it is not clear that there are sensitive views of or across the site.
- Dunsley Farm, Tring – is subject to a degree of landscape constraint, including recognising its close association with Tring Park. However, it relates well to Tring in built form terms, such that there would be relatively limited impacts to sensitive views of Tring from high points in the Chilterns. Also, it can be seen from Figure 5.4 that there is a degree of *relative capacity* here in Green Belt terms.
- Grange Farm, Bovingdon – is subject to fairly limited landscape constraint. The site is also subject to notably limited sensitivity in Green Belt terms, reflecting strong defensible boundaries on all sides.
- Low growth strategy for Kings Langley and Markyate – there are landscape arguments in support of this approach (albeit the effect is to increase pressure for growth elsewhere), as discussed in Section 5.4.
- Growth quantum – the Borough is subject to a high degree of landscape constraint, and this is likely more significant than the degree of constraint affecting neighbouring local authorities. However, landscape and Green Belt are also key constraints influencing plan-making in neighbouring areas.

### DM policy

- 9.13.2 The Interim SA Report (2020) explained:

*"Significant positive effects have been identified in relation to this objective for the policies under the 'Environment and Biodiversity' theme, with DM27 – 'Landscape Character and Chilterns Area of Outstanding Natural Beauty' requiring that all development shall help conserve, restore or enhance the prevailing quality, character and condition of the landscape in Dacorum which particular attention to the Chilterns AONB where proposals for major development would be refused except for in exceptional circumstances; DM35 – 'Protection from Environmental Pollution' seeking to limit and where possible avoid light pollution; and DM38 – 'Open Land' protecting open land from residential development..."*

*"Significant positive effects have also been identified for the policies under the 'Delivering Great Places' theme as SP13 – 'Delivering High Quality Design' should ensure that new development reflects the character of the local area and enhances and complements its surroundings; DM41- 'Height of Buildings' restricts the height of buildings outside of the main urban areas and ensures that any development is sensitive to the distinctive qualities...; DM46 – 'Conservation Areas' seeks to preserve the character of conservation...; and improvements to the canalside environment under DM49 – 'Canalside Environment and Recreational Moorings' would have a positive effect..."*

*"Positive effects have been identified for the policies under the 'Green Belt and Rural Area' theme as SP11 – 'Development in the Green Belt' restricts inappropriate development in the Green Belt; DM39 – 'Limited Infilling in Selected Small Villages in the Countryside' is restrictive in the type and location of new development which would be permitted, thereby protecting 'villagescapes' and supporting this objective; and DM40 – 'Bovingdon Airfield' requires that any development...would be carefully controlled..."*

## Conclusion

- 9.13.3 In conclusion, it is appropriate to flag a **moderate or uncertain negative effect** at this stage in the process, given the sensitivities and the need for further work on site specific policy prior to plan finalisation, e.g. in respect of development densities, scheme layouts and integration of green infrastructure. Perhaps most notably, there is understood to be a need for further work to look at the Gade Valley area within HGC.

## 9.14 Resources

- 9.14.1 The appraisal in Section 6 does not flag any significant issues, although there is a need for further discussion with the County Council regarding minerals safeguarding areas. A **neutral effect** is predicted.

## 9.15 Transport

### Growth strategy

- 9.15.1 This is another key issue locally, hence it is important to note that the revised growth strategy performs very well relative to the alternatives. Considerations include:

- HGC - is distant from Hemel town centre and train. Also, it is noted that the best connected part is potentially the Gade Valley, which is the most sensitive in a number of environmental respects. However, the work completed to date serves to suggest a significant transport opportunity in wide-ranging respects. A Transport Vision & Strategy for HGC is underway, and once published it will be possible to draw firmer conclusions regarding minimising the need to travel and supporting modal shift. A concern is that a high proportion of journeys would be taken by private car to certain key destinations such as Watford, Luton, Rothamsted Research and BRE. However, these concerns must be placed in context, specifically consideration must be given to a South West Herts growth strategy in the absence of HGC.

Also, it is important to consider the wider context around support for HGC aligning with strategic transport planning ambitions for the sub-region, including HERT aspirations for the A414 corridor between Hertfordshire and Essex.

- South Berkhamsted – is supported, and it is generally the case that Berkhamsted benefits from very good public transport connectivity, but traffic through the historic town centre is a clear issue.
- Dunsley Farm, Tring – benefits from good access to the strategic road network and is also in relative proximity to the train station (located to the east of Tring).
- Grange Farm, Bovingdon – is within ~800m of the village centre and primary school, plus there is some employment at Bovingdon (also, the scheme will deliver community infrastructure that is supportive of the village offer). However, it is unavoidably the case that the scheme will be associated with high car dependency in comparison to the sites discussed above.
- Growth quantum – there is a clear transport argument for avoiding exporting unmet need. Specifically, doing so can be a barrier to early and effective strategic transport planning.

### DM policy

- 9.15.2 The Interim SA Report (2020) did not present a stand-alone discussion under a transport heading, but rather explored transport issues/opportunities under the climate change heading. The report's findings on transport related DM policies have been discussed above under 'Climate change mitigation'.
- 9.15.3 Moving forward, there will be a need to ensure a best practice approach to transport planning at HGC, and potentially also South Berkhamsted (as the second largest proposed allocation but also given traffic sensitivities at Berkhamsted). Account should be taken of the latest best practice nationally, including around support for emerging technologies such as driverless cars. There may be the potential for large scale strategic growth locations such as HGC to be designed with driverless cars in mind.
- 9.15.4 Also, it is noted that the Dacorum Local Cycling and Walking Implementation Plan (LCWIP) is still in development (as discussed [here](#)). The LCWIP is a key influence on the emerging St Albans Local Plan, with the plan notably set to deliver significant new strategic cycle infrastructure, and it may prove to be a key resource at the next stage of the Dacorum Local Plan process (although topography is a barrier).

## Conclusion

- 9.15.5 In conclusion, the proposed strategy is encouraging - other than in terms of exporting unmet need – and overall the emerging Local Plan would deliver a positive effect on the baseline (a situation whereby development continues to come forward but in a less well planned way, and without HGC sub-regional transport planning is severely set back). However, there is a need for a considerable amount of further work, hence a **neutral effect** is predicted at this stage.

## 9.16 Water

### Growth strategy

- 9.16.1 The appraisal in Section 6 finds the revised growth strategy to perform broadly on a par with the alternatives, and does not flag any major concerns, although there are a number of issues to explore further ahead of plan finalisation, including around WwTW capacity (including at Berkhamsted).

### DM policy

- 9.16.2 The Interim SA Report (2020) explained:

*“... significant positive effects on this SA objective have been identified as a result of the Local Plan policies under the Environment and Biodiversity theme, in particular: DM33 – ‘Protection and Enhancement of the River Character and Water Environment’; DM34 – ‘Flood Risk and Protection’; and DM35 – ‘Protection from Environmental Pollution’. Policy DM33 requires that the water environment be managed by restoring water courses, avoiding damage or abstraction from the Rivers Ver, Gade and Bulbourne, and locating development away from waterbodies, thereby directly supporting this objective. In addition, by restricting the types of development which can take place in flood risk areas and requiring measures for the control and reduction of surface water run-off, DM34 should help to protect the water environment, whilst DM35 aims to improve water quality standards. Significant positive effects against this objective have therefore been identified in relation to these policies.”*

- 9.16.3 Moving forward one consideration may be whether the District's sensitive chalk stream catchments warrant a particularly stringent policy requirement in respect of water efficiency. For example, in Uttlesford District, where chalk streams are also an issue, the emerging policy requirement is that: “proposals should demonstrate how they incorporate water efficiency measures to minimise consumption of water; protect and enhance water quality; and protect water resources. All new residential development [must achieve] at least the water efficiency of 110 litres per person per day described in the Building Regulations... A standard of no more than 90l/p/d must be achieved in the sensitive chalk stream catchments.”

### Conclusion

- 9.16.4 In conclusion, it is appropriate to flag a **moderate or uncertain negative effect** at this stage, ahead of receiving consultation responses from the Environment Agency, Thames Water and Affinity Water.

## 9.17 Overall conclusions

- 9.17.1 The appraisal presented above seeks to build upon the appraisal of Growth Scenario 4. After having accounted for the proposed growth strategy alongside DM policy from 2020, and after having accounted for established sustainability objectives (see Section 3), the appraisal predicts moderate or uncertain **positive effects** under five headings (Accessibility, Biodiversity, Communities, Economy/employment and Health), but predicts a significant **negative effect** under the Homes topic heading and also flags a moderate or uncertain **negative effect** under three headings (Climate change mitigation, Landscape and Water). Under the remaining topic headings the appraisal concludes broadly neutral effects.

- 9.17.2 There is every likelihood of being able to predict more strongly positive effects at the next stage of plan-making (Regulation 19), at which time there will be the potential to draw upon consultation responses and the outcomes of further detailed work, e.g. in terms of site specific policy and whole plan viability.

- 9.17.3 Issues and tensions with sustainability objectives identified through the appraisal should be taken into account as part of the process of updating the plan (and reasonable alternatives) subsequent to the current consultation, alongside consultation responses received and other new/updated evidence.
- 9.17.4 The appraisal also makes a number of specific recommendations, which should be considered. However, it is recognised that the recommendations are made 'in silos', whilst the Council must reach decisions on balance and from a perspective of ensuring whole plan viability. It is easy for the SA to recommend more stringent policy with a view to improving the performance of the plan in respect of any given sustainability objective, but the implication could be a need for a less stringent policy elsewhere in the plan.

### Cumulative effects

- 9.17.5 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects. The following bullet points cover some key considerations:
- **Housing needs** – this is a key larger-than-local issue. As discussed, there is currently little certainty regarding where, when or even if unmet need will be provided for within a constrained sub-region, such that there is a risk that it might ultimately stay unmet. However, it is recognised that it may well be possible to boost the Local Plan housing supply prior to plan finalisation and, in turn, set the housing requirement at LHN such that the Local Plan does not generate unmet need(s).
  - **Hemel Garden Communities (HGC)** - support for HGC is likely to be of crucial importance for the St Albans Local Plan, and if both the Dacorum and St Albans Local Plans are able to progress then the South West Herts JSP will be well placed to progress and plan for longer term needs alongside infrastructure strategic infrastructure and in line with strategic place-making priorities.
  - **The Chilterns AONB** – HGC is in proximity, but it is not clear that there are particular concerns (the Chilterns Conservation Board will comment further). Again, were HGC not to progress then there could be increased pressure on the AONB through growth at alternative locations. There is also a need to note the Chilterns AONB boundary review, which could feasibly see the AONB extended.
  - **The economy** – there is a need to support HGC and, in turn, the expansion of Maylands Business Park, which is a central component of Herts IQ and, in turn, of great importance from a perspective of realising economic growth and productivity objectives across the South West Herts sub-region.
  - **Transport corridors** – the A414 is a particular focus, from a larger-than-local perspective. There are aspirations for transformational change, with major enhancements supporting objectives for settlements / growth areas between Hemel Hempstead / Watford and Harlow (where there is a committed Garden Town). There is also a clear need to consider the M1 and, in this respect, there will be a need to take careful account of the consultation response received from National Highways.
  - **Traffic and air quality** – this is a matter for further investigation, but one possible issue is growth at Berkhamsted and Bovingdon leading to traffic through the Chesham AQMA, noting that the recent Draft Chesham Neighbourhood Plan proposes significant housing growth within the urban area.
  - **Landscape scale nature recovery** – planning for Ashridge is clearly a larger-than-local consideration, but there are numerous other cross-border landscape scale priority areas, perhaps most notably the Bulbourne / Gade and Grand Union Canal corridor. The Hertfordshire Local Nature Recovery Strategy (LNRS) may provide important evidence to inform plan finalisation, and it may also be possible and appropriate to take account of the LNRSs for Buckinghamshire and Bedfordshire.
  - **Agricultural land** – self-sufficiency of food production is increasingly a key national consideration. The Local Plan will result in a significant loss of high quality agricultural land; however, in the absence of a Local Plan it is difficult to assume that there would be less loss of high quality agricultural land.
  - **Water** – this is a key larger-than-local issue, including given the very large catchment draining to Maple Lodge Sewage Treatment Works. There is a need for early certainty in respect of how growth is set to be distributed across the catchment.

## Part 3: What are the next steps?

# 10 Plan finalisation

## Publication of the Proposed Submission Local Plan

- 10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is ‘sound’ and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.1.2 The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

## Submission, examination and adoption

- 10.1.3 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed ‘sound’. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.5 Once found to be ‘sound’ the Local Plan will be adopted by the Council. At that time a ‘Statement’ must be published that sets out certain information including ‘the measures decided concerning monitoring’.

# 11 Monitoring

- 11.1.1 Within the SA Report (N.B. this is not the SA Report, but rather an “Interim” SA Report), the requirement is to present “measures envisaged concerning monitoring”.
- 11.1.2 The question of an appropriate monitoring framework will be revisited prior to plan finalisation, but it is suggested that monitoring might cover:
  - Hemel Garden Communities – a bespoke monitoring framework could be established.
  - Biodiversity – there will be a need to monitor whether implementation of the biodiversity net gain regime through planning applications aligns with the emerging Hertfordshire Local Nature Recovery Strategy.
  - Climate change mitigation – there is a need for clear criteria to enable scrutiny of the extent to which developments exceed the minimum emissions standards set out in the Building Regulations.
  - Homes – a detailed monitoring framework is already in place, but could potentially be enhanced, for example with figures broken down by settlement.
  - Community infrastructure – Wokingham Borough is commended as an authority that sets out very clear information on progress in respect of delivering infrastructure at strategic growth locations (see [here](#)).
  - Transport – there is a clear need for targeted detailed monitoring. As well as road traffic and air quality, there is a need for improved data on bus patronage and use of cycle routes.
  - Agricultural land – Natural England may wish to comment on potential approaches to monitoring.
  - Historic environment – a typical approach is only to monitor the number of assets at risk, but Historic England may wish to propose additional performance measures through the current consultation.
  - Water – indicators / performance measures in respect of water resources and the water environment could warrant further consideration in collaboration with the Environment Agency.

However, it is recognised that there is also a need for pragmatic consideration of what can be monitored in practice, given available resources.

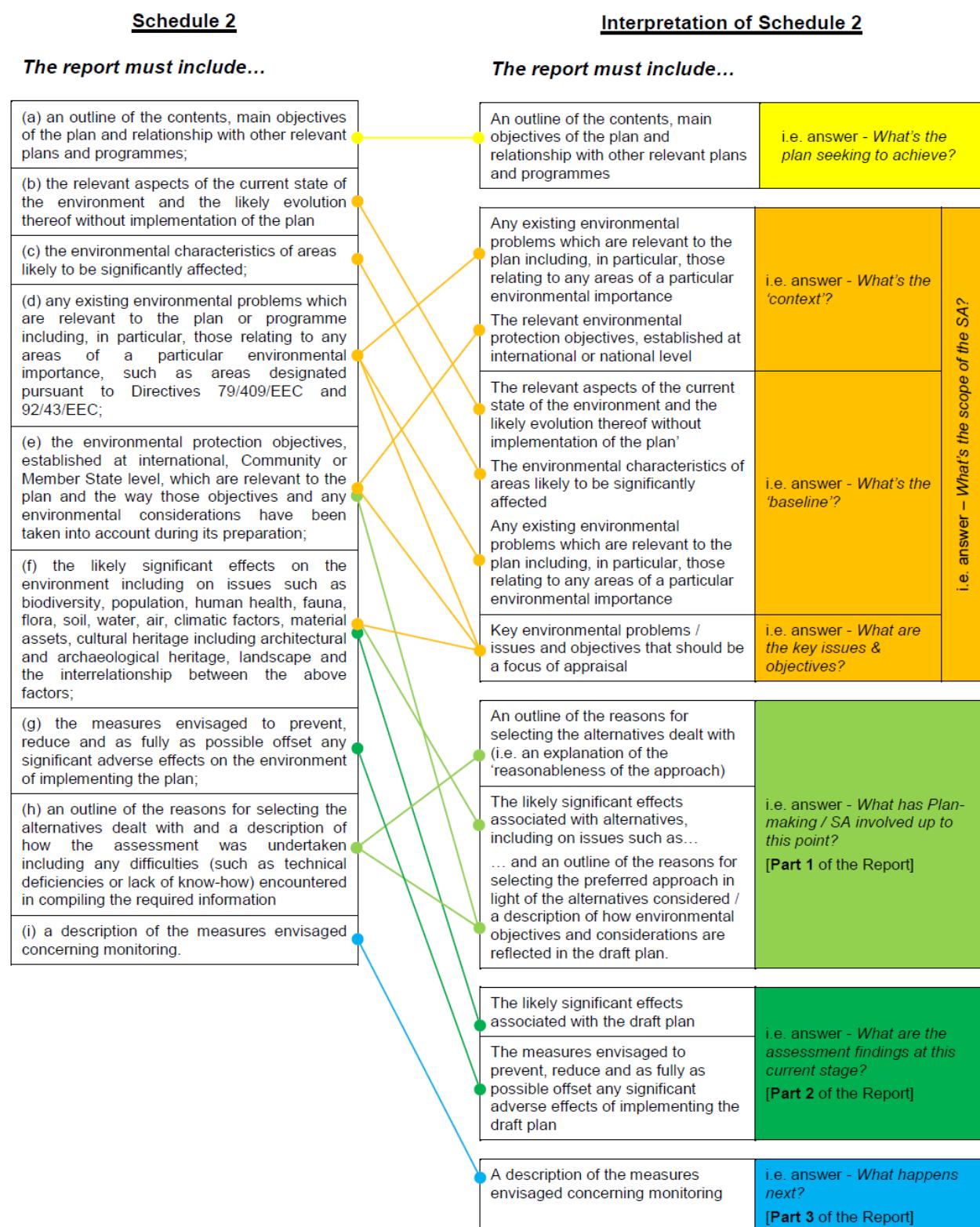
# Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

N.B. this is not the SA Report, but nonetheless aims to present the information required of the SA Report.

**Table A:** Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements

	Questions answered	As per regulations... the SA Report must include...
<b>Introduction</b>	What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the SA scope?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
<b>Part 2</b>	What are the SA findings at this current stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
<b>Part 3</b>	What happens next?	<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

**Table B: Interpreting Schedule 2 and linking the interpretation to the report structure**

**Table C:** 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Sections 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside the Draft Plan in order to inform consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (as discussed in Section 10).