



## **DACORUM LOCAL PLAN TO 2041 Examination in Public**

### **Response to Inspectors' post-Stage 1 Hearings request to the Council: Point (i)**

# Contents

1. Introduction .....	4
2. Identifying the Shortlisted Sites with the Potential to Deliver the Strategy .....	6
3. Updated Site Proformas .....	11
<b>Hemel003   Market Square .....</b>	<b>12</b>
Summary of Officer Recommendations .....	15
<b>Hemel031   Symbio Site, Whiteleaf Road .....</b>	<b>17</b>
Summary of Officer Recommendations .....	19
<b>Hemel042   Site to the South of Green Lane .....</b>	<b>21</b>
Summary of Officer Recommendations .....	22
<b>Hemel058   Plots 2/3 Kier Park, Maylands Avenue .....</b>	<b>24</b>
Summary of Officer Recommendations .....	26
<b>Hemel078   Civic Zone, Marlowes .....</b>	<b>27</b>
Summary of Officer Recommendations .....	29
<b>Hemel081   National Grid and 339-353 London Road .....</b>	<b>31</b>
Summary of Officer Recommendations .....	33
<b>Hemel084   Paradise .....</b>	<b>35</b>
Summary of Officer Recommendations .....	37
<b>Hemel085   Marchmont Farm .....</b>	<b>38</b>
Summary of Officer Recommendations .....	39
<b>Hemel087   Old Town .....</b>	<b>41</b>
Summary of Officer Recommendations .....	42
<b>Hemel089   Hemel Hempstead Hospital .....</b>	<b>44</b>
Summary of Officer Recommendations .....	46
<b>Hemel090   Hemel Hempstead Station Gateway .....</b>	<b>48</b>
Summary of Officer Recommendations .....	50
<b>Hemel094   Riverside .....</b>	<b>51</b>
Summary of Officer Recommendations .....	53
<b>Hemel099   Apsley Mills Retail Park .....</b>	<b>54</b>
Summary of Officer Recommendations .....	56
<b>Hemel113R   Polehanger Lane .....</b>	<b>58</b>
Summary of Officer Recommendations .....	60
<b>Hemel116R   Red Lion Lane .....</b>	<b>62</b>
Summary of Officer Recommendations .....	63
<b>Hemel117R   Shendish Manor and Fairfields .....</b>	<b>65</b>
Summary of Officer Recommendations .....	67
<b>Hemel126R   Shaffold Knoll Farm .....</b>	<b>69</b>
Summary of Officer Recommendations .....	70
<b>Hemel136R   North and North-East of Hemel .....</b>	<b>72</b>
Summary of Officer Recommendations .....	75
<b>Berk019R   South of Berkhamsted and Land between Hanburys and A41 .....</b>	<b>78</b>
Summary of Officer Recommendations .....	81
<b>Berk020R   British Film Institute Archive, Kingshill Way .....</b>	<b>82</b>

Summary of Officer Recommendations .....	84
<b>Berk021R   Blegberry Gardens .....</b>	<b>86</b>
Summary of Officer Recommendations .....	88
<b>Berk025R   Haslam Playing Fields .....</b>	<b>90</b>
Summary of Officer Recommendations .....	92
<b>Berk026R   Ivy House Lane and Grovefield .....</b>	<b>94</b>
Summary of Officer Recommendations .....	96
<b>Berk030R   Land between Shootersway and A41 (Rossway Farm) .....</b>	<b>97</b>
Summary of Officer Recommendations .....	99
<b>Berk031R/Berk032R   East of Berkhamsted .....</b>	<b>101</b>
Summary of Officer Recommendations .....	104
<b>Berk033R   Land east of Darrs Lane .....</b>	<b>106</b>
Summary of Officer Recommendations .....	108
<b>Tring016R   Dunsley Farm .....</b>	<b>110</b>
Summary of Officer Recommendations .....	112
<b>Tring018R   East of Tring .....</b>	<b>114</b>
Summary of Officer Recommendations .....	116
<b>Tring020R   Land North of Icknield Way .....</b>	<b>118</b>
Summary of Officer Recommendations .....	120
<b>Tring021R   South of Gamnel Farm, Bulbourne Road .....</b>	<b>121</b>
Summary of Officer Recommendations .....	123
<b>Tring025R   New Mill .....</b>	<b>125</b>
Summary of Officer Recommendations .....	127
<b>Bov008R   Duckhall Farm .....</b>	<b>129</b>
Summary of Officer Recommendations .....	131
<b>Bov010R   Grange Farm .....</b>	<b>132</b>
Summary of Officer Recommendations .....	134
<b>Bov014R   Homefield .....</b>	<b>136</b>
Summary of Officer Recommendations .....	138
<b>KLang011R   Hill Farm .....</b>	<b>140</b>
Summary of Officer Recommendations .....	142
<b>Mark014R   London Road .....</b>	<b>144</b>
Summary of Officer Recommendations .....	147

Appendix A - Summary of Site Selection (Updated Version November 2025) | See separate document

## 1. Introduction

1.1. Following on from the Stage 1 hearings undertaken in September 2025, the Inspectors' requested the Council to produce the following information:

- (i) *A succinct commentary on the reasons and judgements made as to why certain sites progressed to allocations but others were discounted (or direct reference to where such evidence currently exists in the examination library). That commentary should follow on from the Topic Paper of 2020, be on a site-by-site basis, and refer wherever possible to existing evidence. The commentary must move beyond a factual explanation of sites' assessed suitability, availability and achievability, as in the various evidence documents cited above, and provide the justification for the choices made in allocating sites relative to ones that were discounted.*
- (ii) *A list of all Green Belt sites proposed for release, along with a justification for their allocation having regard to reasonable alternatives, including sites which were found to cause less harm to the purposes of the Green Belt.*

1.2. This paper seeks to respond primarily to the first request, although the conclusions set out within this paper are reflected within the Council's response to the second request.

1.3. The following sections of the paper are structured as follows:

- **Section 2** presents a summary of how the site selection process has evolved since 2020 and what is the key evidence that explains the narrative for the selection of sites and how this has been considered through more recent evidence. It presents a list of sites that the Council considered had potential to deliver the strategy of the emerging Dacorum Local Plan to 2041 (CD01.1), albeit the justification for these sites is included within Section 3 of this document (see below).
- **Section 3** presents updated site proformas for the proposed allocations within CD01.1, and those sites which were considered by the Council to be reasonable alternatives, but which were omitted. These proformas contain the "succinct commentary" requested, setting out the Council's summary reasons and judgments for sites at each key consultation stage between 2020 and 2024, and set out the detail underpinning these judgments.

The proformas in Section 3 represent an update to the site proformas contained in Appendix B of the Emerging Strategy for Growth: Site Selection Topic Paper 2020 (PCD05.3). In line with the Inspectors' request (i) they sign-post to relevant evidence where appropriate and do not seek to introduce new evidence which has not already been submitted as part of the Local Plan Examination.

The officer recommendations and justifications for sites at each key consultation stage flows from what is presented within the Topic Paper of 2020 (PCD05.1-05.3) and draws upon the matters set out within the thematic headings of the proforma. The officer recommendations and justifications represent a summary of the key considerations informing decision-making on-site selection at key stages of the process, as part of the ongoing consideration of all relevant factors and evidence underpinning the site selection process.

- **Appendix A** presents an updated version of the Appendix A provided in support of the Council's Matter 2 Hearing Statement (September 2025) to include the officer justifications as set out within the updated proformas in this paper.

This also seeks to add clarity on the Council's justification for the HELAA Deliverable and Developable sites sifted at 'the stage of the process prior to identifying sites with the greatest potential to meet the strategy of the plan and developing reasonable alternative growth scenarios'<sup>1</sup>. This further ensures that this document is robust and includes the Council's justification for why sites were discounted having regard to the evidence, including the Sustainability Appraisal.

- 1.4. The Council notes that this paper should not be treated in isolation, but as part of an already comprehensive suite of evidence on site selection which has been presented to date, including:
- a) **Emerging Strategy for Growth: Site Selection Topic Paper (Nov 2020)** (PCD05.1-05.3): This was the starting point for setting out what sites were considered for potential allocation, and which were recommended to be included in the draft Local Plan consulted on at that time. The sites considered to have the greatest potential for allocation remained broadly unchanged since 2020, particularly in respect of land on the edge of the six main settlements.
  - b) **Housing and Economic Land Availability Assessment 2024 (Oct 2024)** (SSA01.1-01.4): This is now the Council's most up to date evidence on all sites considered for the new Local Plan to 2041. It was an update on similar studies that accompanied earlier consultations on the draft Local Plan.
  - c) **Sustainability Appraisal of the Dacorum Local Plan (Nov 2024)** (CD03.1): This included an important narrative for the development of, as well as the discounting of in some situations, spatial options. The narrative is an iterative one between officers in the Council and consultants AECOM, which drew upon multiple sources of information including the HELAA, feedback received through consultation and wider evidence prepared by the Council. The Council's justification on its preferred scenario, relative to alternative growth scenarios, is presented in Section 7 of the Sustainability Appraisal (CD03.1).
  - d) **Summary of Changes to the Spatial Strategy and Site Allocations (Nov 2024)** (CD10.6): This is intended to serve as a high-level summary of the changes to the strategy and site allocations over time. It presented the sites included in the Emerging Strategy for Growth consultation in 2020, as well as the changes that had been made to sites in 2023 and most recently with the submitted Local Plan. It also highlighted the relevant evidence, including the Sustainability Appraisal, prepared at each stage. It also referenced any other material considerations that informed officer recommendations, such as draft changes to national policy and to the standard method for calculating housing needs.
  - e) **The Council's Matter 2 Hearing Statement:** The Council's response to Issue 3 – Site Selection Methodology is also relevant and the Council's response to Issue 3, Question 5 demonstrates the robustness of the Council's evidence.
  - f) **Appendix A of the Council's Matter 2 Hearing Statement:** This summarises, very briefly, how sites were considered at various stages of the process. It represents an update to Appendix A of the Site Selection Topic Paper 2020 (PCD05.2).
- 1.5. The evidence above demonstrates the considerable work progressed by the Council on site selection to date.

---

<sup>1</sup> See further below on the key stages to the site selection process, as was reflected in Appendix A to the Council's Matter 2 Hearing Statements.

## 2. Identifying the Shortlisted Sites with the Potential to Deliver the Strategy

- 2.1. Whilst considerable work on site selection was carried out prior to the Housing and Economic Land Availability Assessment (Oct 2024) (SSA01.1-01.4) (“HELAA”) (as can be seen in the Topic Paper of 2020), the HELAA provides a useful starting point for considering the site selection underpinning the submission version of the Local Plan. It is also the most up to date evidence on sites in Dacorum and the conclusions supersede those made within previous site assessment studies used to inform earlier iterations and public consultation of the new Local Plan.
- 2.2. The Council’s response to Matter 2, Issue 3, Question 5 appropriately summarises the HELAA process and outcomes. 333 sites were assessed in total, with 253 of these assessed in detail<sup>2</sup>. The outcomes of the detailed assessment were then used to inform the next step of plan preparation, consistent with stage 5 of the Planning Practice Guidance site selection methodology flowchart<sup>3</sup>.
- 2.3. Beyond the HELAA, the Council’s approach to site selection has broadly followed the same path and process to that presented in section 3 of the Site Selection Topic Paper 2020 (PCD05.1). This includes:
- a) An understanding of existing housing commitments.
    - i. Information updated annually
    - ii. Most recent detail presented in Council’s reply to Inspectors’ Initial Questions (DBC/ED3, Appendix B and C)
  - b) Determining a suitable windfall allowance.
    - i. Most recently in the HELAA 2024 (SSA01.1, pages 31-38)
  - c) Existing allocations were reviewed.
    - i. Most recently in the HELAA 2024, Appendix B - Review of existing allocations (SSA01.3)
  - d) Comparison of existing housing supply against local housing need.
    - i. Most recently in the Summary of changes to the Spatial Strategy and Site Allocations (CD10.6, pages 32-33)
  - e) Green Belt and consideration of all other reasonable alternatives.
    - i. Most recently in the Exceptional Circumstances Case to Justify Changes to the Green Belt (SSA07.1, Section 3)
  - f) Having regard to the most up to date evidence on individual sites.
    - i. The key evidence on sites prepared at each key stage of the plan’s development is presented in the Summary of changes to the Spatial Strategy and Site Allocations (CD10.6, pages 11, 13, 37-39)
  - g) Engagement with infrastructure providers.
    - i. Most recently in the Infrastructure Delivery Plan (IDV02.1-02.2)<sup>4</sup>
  - h) Consideration and review of emerging spatial strategy and recommending a preferred option.
    - i. Most recently in the Summary of changes to the Spatial Strategy and Site Allocations (CD10.6)

---

<sup>2</sup> Council’s response to Matter 2, Issue 3, Question 5 – paragraph 3.5.3.

<sup>3</sup> Available to view at <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#method--flowchart>

<sup>4</sup> Updated to take account of feedback received through Regulation 19. An earlier version (IDV01.1-01.2) supported the Regulation 19 publicity period.

- 2.4. These considerations informed, as well as were informed by, the iterative process of the Sustainability Appraisal, incorporating a Strategic Environmental Assessment. Officers in the Council engaged regularly with consultants AECOM during this process, and appraisals were undertaken in 2023 (CD04.1) and most recently in 2024 (CD03.1). This allowed an opportunity for the Council to revisit components of the site selection / spatial strategy process presented in Table 7 of the Site Selection Topic Paper 2020 (PCD05.1) and consider/reconsider the potential for the allocation of individual site options, considering the HELAA, feedback received through consultation and wider evidence prepared by the Council.
- 2.5. The approach taken here was in line with the ‘if in doubt, assess it through the Sustainability appraisal’ approach for sites outside of the main settlement boundaries and relate to sites in the Green Belt. Such elements included:
- a) Reconsidering allocating smaller sites / sites in smaller villages: Considered in paragraph 5.2.53 and 5.4.77-84 of CD03.1.
  - b) Reconsidering sites at higher risk of flooding: Outcomes of the SA has informed the Sequential and Exceptions Test (CSN13.1).
  - c) Reconsidering allocating sites that would erode an important open gap between settlements: Sites discussed in Section 5.4 of CD03.1, including specific reference in paragraph 5.4.20.
- 2.6. Considering all the above processes, the Council’s strategic approach to the selection of sites outside of the six main settlements remains broadly unchanged from that presented in the Site Selection Topic Paper 2020 (PCD05.1).
- 2.7. The above processes are reflected in diagram below, which sets out a summary of the key stages the Council followed to inform the Pre-Submission version of the Dacorum Local Plan to 2041 (CD01.1)

**Regulation 18 Plan Preparation and Evidence Base**

This informed all work undertaken to support the Regulation 19.

**Stages 1 and 2: Site Survey & Site Assessment (HELAA)**

The HELAA filtered sites which had intrinsic constraints, then assessed the remaining sites in detail to determine if they are considered suitable, available and achievable. The HELAA also included a windfall assessment.

**Stage 3: Refining shortlist of Site Options**

Sites were filtered from further assessment as they have an unknown factor associated with them and are not considered to meet the NPPF para 69 tests (this is supported within section 5.3 of CD03.1).

**Stage 4: Identifying Sites with Potential to Deliver the Spatial Strategy**

Considered individual HELAA Deliverable and Developable site options and combinations of site options, with reference to the strategic context and wider evidence base. This ruled out many site options from scenario testing and is set out within CD03.1 in section 5.4 on a site-by-site basis.

**Stage 5: Appraising Growth Scenarios (SA Report Section 6)**

Appraised a combination of shortlisted site options (‘growth scenarios’) in accordance with the SA framework.

**Stage 6: Selecting the Preferred Strategy**

Section 7 of CD03.1 provided the officer justification for selecting the preferred scenario, officers considered the results of the appraisal in Section 6, in line with the wider evidence base, as set out within the updated proformas within this table.

- 2.8. Once the preferred scenario was selected, officers undertook meetings with promoters of the preferred sites to develop site policies and update delivery timescales. Officers also undertook consultation with infrastructure providers to update IDV01.1 and IDV02.1. The scenario was also appraised within CD03.1 in 'Part 2' in the context of the proposed policies.
- 2.9. The following table lists the sites that the Council considered (after following the above process) had the potential to deliver the strategy of the new Local Plan to 2041. It includes the sites that are recommended for allocation as well as those that were discounted at the most advanced stage of selection. This reflects those sites identified in Stages 5 and 6 of Appendix A of the Councils Matter 2 Hearing Statement (September 2025), as updated by this paper (November 2025).

Table 1

Site	HELAA	Settlement	Status	Green Belt Status
North Hemel Hempstead Growth Area	Hemel136R	Hemel Hempstead	Allocation in submitted plan (Hm01)	Site is proposed to be removed from the Green Belt
Civic Centre (Previously MU/1)	Hemel078	Hemel Hempstead	Allocation in submitted plan (Hm02)	Site is within the existing settlement boundary of Hemel Hempstead
Hemel Hempstead Hospital (previously MU/2)	Hemel089	Hemel Hempstead	Allocation in submitted plan (Hm03)	Site is within the existing settlement boundary of Hemel Hempstead
Paradise (previously MU/3)	Hemel084	Hemel Hempstead	Allocation in submitted plan (Hm04)	Site is within the existing settlement boundary of Hemel Hempstead
Market Square	Hemel003	Hemel Hempstead	Allocation in submitted plan (Hm05)	Site is within the existing settlement boundary of Hemel Hempstead
Riverside	Hemel094	Hemel Hempstead	Allocation in submitted plan (Hm06)	Site is within the existing settlement boundary of Hemel Hempstead
Symbio Site, Whiteleaf Road	Hemel031	Hemel Hempstead	Allocation in submitted plan (Hm07)	Site is within the existing settlement boundary of Hemel Hempstead
Hemel Hempstead Station Gateway (previously MU/4)	Hemel090	Hemel Hempstead	Allocation in submitted plan (Hm08)	Site is within the existing settlement boundary of Hemel Hempstead
National Grid (previously H/2)	Hemel081	Hemel Hempstead	Allocation in submitted plan (Hm09)	Site is within the existing settlement boundary of Hemel Hempstead
Apsley Mills Retail Park	Hemel099	Hemel Hempstead	Allocation in submitted plan (Hm10)	Site is within the existing settlement boundary of Hemel Hempstead
Land at Shendish Manor and Fairfields	Hemel117R	Hemel Hempstead	Allocation in submitted plan (Hm11)	Site is proposed to be removed from the Green Belt
Plots 2/3 Kier Park, Maylands Avenue	Hemel058	Hemel Hempstead	Allocation in submitted plan (Hm12)	Site is within the existing settlement boundary of Hemel Hempstead
Polehanger Lane	Hemel113R	Hemel Hempstead	Allocation in submitted plan (Hm13)	Site is proposed to be removed from the Green Belt



Site	HELAA	Settlement	Status	Green Belt Status
Marchmont Farm (previously LA1)	Hemel085	Hemel Hempstead	Allocation in submitted plan (Hm14)	Site is within the existing settlement boundary of Hemel Hempstead
Old Town (previously LA2)	Hemel087	Hemel Hempstead	Allocation in submitted plan (Hm15)	Site is within the existing settlement boundary of Hemel Hempstead
Site to the south of Green Lane	Hemel042	Hemel Hempstead	Allocation in submitted plan (Hm16)	Site is within the existing settlement boundary of Hemel Hempstead
Jarman Park	Hemel010	Hemel Hempstead	Allocation in submitted plan (Hm17) non residential	Site is within the existing settlement boundary of Hemel Hempstead
Grovehill Local Centre	Hemel091	Hemel Hempstead	Allocated in the Grovehill NDP	Site is within the existing settlement boundary of Hemel Hempstead
Red Lion Lane	Hemel116R	Hemel Hempstead	Omission site	Site is located within the Green Belt
Shafford Knoll Farm	Hemel126R	Hemel Hempstead	Omission site	Site is located within the Green Belt
South of Berkhamsted and Land between Hanburys and A41	Berk019R	Berkhamsted	Allocation in submitted plan (Bk01)	Site is proposed to be removed from the Green Belt
British Film Institute Archive, Kingshill Way	Berk020R	Berkhamsted	Allocation in submitted plan (Bk02)	Site is proposed to be removed from the Green Belt
Haslam Playing Fields	Berk025R	Berkhamsted	Allocation in submitted plan (Bk03)	Site is proposed to be removed from the Green Belt
Blegberry Gardens	Berk21R	Berkhamsted	Omission site	Site is located within the Green Belt
Ivy House Lane and Grovesfield	Berk026R	Berkhamsted	Omission site	Site is located within the Green Belt
Land between Shootersway and A41 (Rossway Farm)	Berk030R	Berkhamsted	Omission site	Site is located within the Green Belt
East of Berkhamsted	Berk031R/ Berk032R	Berkhamsted	Omission site	Site is located within the Green Belt
Land east of Darrs Lane	Berk033R	Berkhamsted	Omission site	Site is located within the Green Belt
Dunsley Farm	Tring016R	Tring	Allocation in submitted plan (Tr01)	Site is proposed to be removed from the Green Belt
New Mill	Tring025R	Tring	Allocation in submitted plan (Tr02)	Site is proposed to be removed from the Green Belt
East of Tring	Tring018R	Tring	Allocation in submitted plan (Tr03)	Site is proposed to be removed from the Green Belt
Land north of Icknield Way	Tring020R	Tring	Omission site	Site is located within the Green Belt

Site	HELAA	Settlement	Status	Green Belt Status
South of Gamnel Farm, Bulbourne Road	Tring021R	Tring	Omission site	Site is located within the Green Belt
Grange Farm	Bov010R	Bovingdon	Allocation in submitted plan (Bv01)	Parcel contributes weakest towards purposes.
Duckhall Farm	Bov008R	Bovingdon	Omission site	Site is located within the Green Belt
Homefield	Bov014R	Bovingdon	Omission site	Site is located within the Green Belt
Hill Farm	Klang011R	Kings Langley	Omission site	Site is located within the Green Belt
London Road	Mark014R	Markyate	Allocation in submitted plan (Mk01)	Site is proposed to be removed from the Green Belt

### 3. Updated Site Proformas

- 3.1. This section presents updated site proformas, considering the evidence base following the 2020 Emerging Strategy for Growth consultation up to the publication of the Local Plan, for each site which was considered appropriate to be evaluated as part of reasonable alternative growth scenarios.
- 3.2. The updated proformas provide the reasons for supporting / discounting site options, on a site-by-site basis, and represents an updated assessment to that undertaken in Appendix B of the Site Selection Topic Paper 2020 (PCD05.3). At the end of each proforma officers have provided succinct comments to assist in understanding the recommendation for the site and the overall justification, set out for each key consultation stage of the plan preparation process from 2020 to 2024.
- 3.3. This paper sets out why conclusions were made up to the point of formally publishing the pre-submission version of the Dacorum Local Plan to 2041 (CD01.1), however this also sets out, where relevant, new matters raised by the Regulation 20 representations and how these were considered prior to the submission of the Local Plan in March 2025. Officers have also included ‘post-submission consideration’ (matters raised following the Submission of the Local Plan) to assist future discussions only if they relate directly to any issues raised within the site assessment process. For the avoidance of doubt, these matters did not inform the council’s decisions on site selection.

#### Differences to the Site Selection Topic Paper 2020 (PCD05.1)

- 3.4. The key difference is that the Site Selection Topic Paper 2020 (PCD05.1) only considered greenfield sites and made new recommendations on these. This paper sets out the reasons for the allocation of all sites included within the submission version of the Local Plan CD01.1 and provides succinct comments to assist the Inspectors in understanding the justification as to why the omission sites were discounted.
- 3.5. Officers have also recommended changes to the headings within the detailed proforma as follows:

Table 2

Change	Reason
‘Potential for new Public/Community Facilities’ has been removed, and is now split into three new indicators: <ul style="list-style-type: none"> <li>- Housing and economy</li> <li>- Social Infrastructure</li> <li>- Green Infrastructure</li> </ul>	In Appendix B to the Site Selection Topic Paper 2020 (PCD05.3) ‘Potential for new Public/Community Facilities’ was a broad assessment category, reflecting the level of information officers had available to them at the time of preparing the first full draft of the Local Plan. As information on infrastructure provision and site requirements has been developed and refined over the plan making process, officers were able to consider more detailed consideration of those matters within the site selection process. Matters regarding housing, economy and employment and infrastructure were considered in detail throughout the Sustainability Appraisal process.
‘Public transport’ has been updated to ‘sustainable transport’	This is because the Council’s site selection process also considered connectivity, opportunities, and limitations in relation to active travel. Matters regarding pedestrian connectivity and accessibility to services were considered in detail throughout the Sustainability Appraisal and site selection process.
A new indicator ‘Viability and Deliverability’ has been added	This is because the Council prepared a whole plan viability assessment in 2023, which became a principal factor in considering

3.6. Updates in evidence and stakeholder representations have resulted in fourteen sites that were considered within PCD05.1 in 2020 being discounted at earlier stages of the site selection process informing CD01.1. The sites considered in 2020 which are not considered now are listed below:

- Lock Field, New Road, Northchurch (Berk035R) | Stage 4
- Fox Meadow (Bov009R) | Stage 4
- Land north of Vicarage Lane (Bov015R) | Stage 3
- Land adj. Red Lion public house (Hemel105R) | Stage 3
- Land south of Link Road / west of Fletcher Way (Hemel110R) | Stage 3
- New settlement near Long Marston (LMar002R) | Stage 3
- Land at Bank Mill (Berk027R) | Stage 2
- Fields End Farm (Hemel101R) | Stage 2
- Fields End Lane (Hemel102R) | Stage 2
- Land North of Coniston Road (KLand015R) | Stage 2
- Cotton Spring Farm (Mark008R) | Stage 2
- Bovingdon Airfield (Bov021R) | Stage 1
- Rectory Farm (KLand017R) | Stage 1
- Wayside Farm, Middle Farm and A4251 (KLand019R) | Stage 1

3.7. The justification for discounting these sites is set out within Appendix A of this paper.

3.8. Fifteen sites have been introduced to this paper, which were not considered within PCD05.1 previously (most of these are urban allocations as it was not the role of PCD05.1 to assess these in 2020):

- Hemel003 Market Square
- Hemel031 Symbio Site, Whiteleaf Road
- Hemel042 Site to the south of Green Lane
- Hemel058 Plots 2/3 Kier Park, Maylands Avenue
- Hemel078 Civic Zone, Marlowes (Previously MU/1)
- Hemel081 National Grid and 339-353 London Road (previously H/2)
- Hemel084 Paradise (previously MU/3)
- Hemel085 Marchmont Farm (previously LA1)
- Hemel097 Old Town (previously LA2)
- Hemel089 Hempstead Hospital (previously MU/2)
- Hemel090 Hempstead Station Gateway (previously MU/4)
- Hemel094 Riverside
- Hemel099 Apsley Mills Retail Park
- Hemel126R Shaffold Knoll Farm
- Tring020R Land North of Icknield Way

3.9. Maps of all the sites can be viewed on the Examination Library<sup>5</sup> using the [Interactive Map to support HELAA Update 2024 & Appendices \(LINK\)](#).

## **Hemel003 | Market Square**

---

<sup>5</sup> <https://letstalk.dacorum.gov.uk/local-plan-to-2041-and-evidence>

Description	Large brownfield site within the town centre. The land was previously occupied by the market (temporary stalls) and bus station and interchange (permanent building and bus stops accessed from Waterhouse Street); however, these uses were relocated to the central Marlowes area in the 2010s leaving the site vacant.
2024 Capacity of site	HELAA (SSA01.4): Healthcare uses. Site promoter: Healthcare uses
2024 HELAA conclusion	Potentially Developable: The site has been identified as potentially suitable and achievable. Whether the site becomes developable will depend on further assessment through the plan making process regarding the site's feasibility for the proposed healthcare use.

Housing & Economy	Allocation for healthcare uses removes the ability of the site to deliver homes, however it is noted that once hospital facilities are relocated onto this site there would be potential for Hemel089 to be further optimised. The provision of healthcare facilities on the Market Square site would provide improvements to the public realm and increase footfall to the town centre.	
Social Infrastructure	The preferred option for this site is to accommodate healthcare, predominantly hospital facilities (relocated from site Hemel089) but also GP and other local services. These would be in a modern building in a town centre location, adjacent to access to the Marlowes bus interchange.	
Green Infrastructure	Development for health facilities would provide opportunities for high quality greening features to improve environmental conditions, create green social and activity spaces, and improve green connections to the Water Gardens.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	The Dacorum Level 2 Strategic Flood Risk Site Assessments (Aug 2024 CSN04.2) confirmed that the site is wholly within Flood Zone 1. 36% of the site is at a low risk of surface water flooding, with 6% at medium risk, and 1% high. The surface water flood risk is located on the western boundary of the site. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	According to the 2024 HELAA Update (SSA01.1), part of the site is within 25m of the River Gade. There are no other identified ecological constraints associated with this site.	
Historic Environment	The site is located adjacent to the Hemel Water Garden grade II registered park to the west, and there are four grade II listed buildings located within 100m of the site towards its eastern boundary on Marlowes. Officers note that Historic England objected in principle to infilling this site with buildings due to the impact this would have on views to the Water Gardens, however officers consider that these concerns will likely be able to be mitigated during the detailed design stage.	
Highways Impact	Development of this site would likely to impact the local road network and key routes that radiate from the town centre. The town centre and hospital services are trip attractors to part of Hemel Hempstead.	
Sustainable Transport	The site is located closely to the Marlowes Bus Interchange which offers a wide selection of frequent bus services including the 1/1B to high	

	Wycombe, 20 to Watford, 46 to Luton, 302 to St Albans/Welwyn Garden City, 322 to Rickmansworth and the 500/501 to Aylesbury, but also a range of local circular routes such as the 2 Woodhall farm to Bennetts end, 3 Grovehill to Chaulden and 4 Grovehill to Warners End. The Marlowes also has a range of less frequent local routes. The central location of the site is highly sustainable with good access to a range of services and facilities.	
Access	The site is accessible from the local road network via Waterhouse Street and Marlowes and has good access to local facilities and public transport. Servicing will be provided from Waterhouse Street.	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is located within 50m of the former land use risk zones associated with the hospital and historic industrial works. 100% of the site is located within Source Protection Zone 2.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. However, BGS data identifies some potential sand and gravel deposits beneath the site, and the minerals authority encourage opportunistic extraction.	
Viability and deliverability	<p>The site is within the ownership of Dacorum Borough Council and is allocated within the Adopted Site Allocations DPD for leisure uses (reference L/1). The site was re-promoted by the Council for a residential led mixed use scheme (including leisure and retail) as part of the Local Plan process. The Local Plan Viability Assessment (IDV03.1) indicated residential development on this site would be challenging.</p> <p>At the meeting of Full Council on 15 November 2023, the Leader of the Council announced that initial feasibility work undertaken in 2023 demonstrated that the site was of adequate size and a good location for the provision of health facilities<sup>6</sup>, and established a partnership between the Council, NHS ICB and WHTH Trust to develop a proposal for the site. The NHS are required to follow a multi-stage approvals process for large projects, as set out within the HM Treasury Green Book.</p>	

<sup>6</sup> Full Council meeting 15<sup>th</sup> of November 2023

<https://democracy.dacorum.gov.uk/ielistDocuments.aspx?CId=156&MId=3688>

	The first stage, a Project Initiation Document, was approved Council's Cabinet in July 2024 <sup>7</sup> (alongside relevant NHS boards), who approved funding to progress to the next stage of the project – the 'Strategic Outline Case' (SOC). This is expected to be submitted in 2025 to HM Treasury and NHS England in 2025 before progressing to Outline and Full Business Cases (including detailed design).	
--	--	--

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 36)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
-	?	?	✓	✓	✓	-	?	✓	✓	✓✓	?	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the 'town centre opportunity area' (5.4.13) for a total of 1,750 homes across multiple allocations.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
This site was not included within the scenario testing as it was no longer promoted for residential, however it was considered as part of the Sustainability Appraisal of the Pre-Submission Local Plan within section 9 (9.2.2, 9.9.2 and 9.10.2).														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 130 dwellings.
2020 Justification	The Urban Capacity Study (SSA04.5 pg. 56) identified that the Market Square site is suitable, available, and viable where it seeks to deliver a higher density scheme (noting that it may not be fully viable against all policies in the plan).
2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 150 dwellings.
2023 Justification	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council's adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).

<sup>7</sup> Cabinet meeting 23<sup>rd</sup> of July 2024 Item 8 <https://democracy.dacorum.gov.uk/ieListDocuments.aspx?CId=157&MId=3859>



	It was also considered at the time that the site would be able to be optimised further and increased from 130 dwellings to 150 dwellings.
--	---

2024 Recommendation	Site is proposed as an allocation for healthcare uses as a first preference.
2024 Justification	<p>Whilst officers previously recommended this site for residential development, considering the evidence relating to viability, officers decided that this site should be considered primarily for healthcare facilities. This reflects an agreed position between the Council and NHS HWE Integrated Care Board in 2024 to consider the potential for a 'health campus' on this site.</p> <p>The site is available now, in a highly sustainable location, is previously developed and is currently vacant. The provision of healthcare facilities in a modern, centrally located building would benefit the public on a borough-wide scale.</p> <p>The work undertaken to date provides confidence that there is a reasonable prospect the site will be developed for this use during the period of the Local Plan. The achievability of the site for this use will be confirmed by the business case development process, and constraints identified are likely to be mitigated through further detailed design considerations. This proposal is endorsed by the Council, the NHS HWE Integrated Care Board and West Hertfordshire Teaching Hospitals Trust.</p> <p>Officers note concerns about the potential for development to impact upon designated heritage assets. Officers consider development of the site is expected to result in less than substantial harm to these assets, but that this is subject to further detail and design. Officers consider there is sufficient policy hooks in the plan to ensure any identified harm is addressed appropriately.</p> <p>Whilst officers are confident the site will be developed, to account for the multiple stages of approvals associated with the Business Case development process, the site is likely to deliver later within the period of the Local Plan. As more detail emerges, it can be considered through a future review of the plan.</p>

**Post Submission matters of note:** the Strategic Outline Case is now in the process of being approved by the relevant boards and committees. The current timescales indicate that subject to approval, the SOC will be submitted to HM Treasury and NHS England in late November 2025. It is estimated that the Outline Business Case and the first stage detailed design will be produced and submitted in 2026.



## Hemel031 | Symbio Site, Whiteleaf Road

Description:	The site mostly occupied by a derelict four storey building, previously used as offices. This is surrounded by hardstanding. It is bounded by employment uses to the west and south, a food store to the east and the car park for the food store to the north.
Capacity of site	HELAA: 55 Site promoter: 100
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is expected to deliver apartments. It is unlikely to be of a scale to deliver specialist types of accommodation or larger properties with more than three bedrooms; however, it is likely to contribute to the need for one- and two-bedroom properties in the borough. The site is a sustainable location and forms part of the urban capacity of Hemel Hempstead. Development in this location would reduce the need to deliver homes within the Green Belt.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed in isolation. Hertfordshire County Council raised objection in 2023 to the wider Two Waters Opportunity Area due to primary school capacity, however CD03.1 noted that the identification of a primary school site at Hemel117R is likely to resolve this, subject to the site's suitability.	
Green Infrastructure	This site is located within the catchment of established SANG solutions, including Westbrook Hay. As this site is an urban regeneration site it is unlikely to meet all of its identified open space needs on site due to its small size, but it is expected to provide high quality on-site amenity green space, play provision and greening features, in addition to contributions towards offsite sport and leisure provision.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	The site has a low risk of flooding from fluvial and surface water. There is a moderate risk of groundwater flooding to subsurface assets however this is unlikely to reach the surface level.	
Environmental	The site is located within 800m of the Roughdown Common SSSI. Natural England raised that development could impact priority habitat deciduous woodland adjacent to the site within their response to the Revised Strategy for Growth.	
Historic Environment	The site does not have any identified heritage constraints.	
Highways Impact	Development of this would likely result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network. The site is expected to contribute towards enhancements to the road network along London Road and Two Waters Way.	
Sustainable Transport	Site is situated within walking distance to bus services H19 (Kings Langley), 322 (Rickmansworth), 207 (Long Marston). The site is also a 10–	

	15-minute walking distance to Hemel Hempstead train station. The site is expected to make proportionate contributions towards improvements to the Grand Union Canal towpath alongside other pedestrian and cycle improvements between the town centre, Hemel Hempstead station and Apsley/Two Waters. The site is located closely to a proposed Local Mobility Hub on London Road close to the A414 junction.	
Access	The site has an existing access onto Whiteleaf Road.	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth. (CD10.5)</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is within 800 metres of the Lawn Lane AQMA and the London Road Apsley AQMA. The site is located within the Transco London Road Health and Safety Executive Consultation Zone. The site is 100% located within the former land use risk zone associated with the industrial estate.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. However, BGS data identifies some potential small sand and gravel deposits beneath the site, and the minerals authority encourage opportunistic extraction.	
Viability and deliverability	<p>The viability assessment (IDV03.1) concluded that the percentage of affordable homes delivered in wholly flatted development in Hemel Hempstead should be set at 25% within policy to maintain viability of these developments.</p> <p>This site is expected to deliver tall buildings, and it is noted that buildings above 18m will be required to provide a second staircase from 2026, which is likely to impact the development potential of urban sites on a smaller footprint. Pre-Application discussions with the site promoter suggest the site can deliver around 100 dwellings.</p> <p>The site falls within the Two Waters Opportunity Area, which has been identified throughout the plan making process as a key regeneration opportunity, where densities can be maximised.</p>	

SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment		
?	-	-	✓	✓	✓	-	?	✓	✓	✓✓	✓	✓	×	✓	✓	×
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)																
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the ‘two waters opportunity area’ (5.4.14) for a total of 2,000 homes across multiple allocations.																
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)																
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.																

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 180 dwellings
2020 Justification (SSA04.5 pg. 111-112)	The strategy for development in the six main settlements seeks to maximise the delivery of previously developed and underutilised land (PCD05.1, page 31), and the Council believes that there is a case to focus new urban allocations on key opportunity areas where the development potential can realistically be maximised through the plan-making process (PCD05.1 3.44). The Urban Capacity Study (2020) identified that the site is suitable, available and is likely to be viable where it seeks to deliver a higher density scheme. The site is located within the Two Waters Opportunity Area.
2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 180 dwellings
2023 Justification	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council’s adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed as an allocation for around 100 dwellings
2024 Justification	There is a clear strategic case to maximise urban capacity within Hemel Hempstead, where these sites can deliver in the plan period. This is an available site which is located within the built-up area of Hemel Hempstead and has the potential to deliver early within the period of the Local Plan.

	The latest position from the site promoter confirms that the site can accommodate around 100 dwellings, therefore the overall allocation should be amended to reflect this.
--	---

**Pre-Submission considerations:**

Wastewater: the 2024 Regulation 20 representation from Thames Water raised that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

## Hemel042 | Site to the South of Green Lane

Description:	The site is currently used as paddock land and is bounded by the Maylands industrial estate to the north, new residential development to the south, school playing fields to the west and agricultural land to the east. The land to the east is located within St Albans District and is proposed to be allocated for residential led mixed use development, supporting the wider 'Hemel Garden Communities' programme (reference H4) within their emerging Local Plan.
Capacity of site	HELAA: 81 Site promoter: 80
HELAA conclusion	Deliverable: The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, although it is unclear if the site would be of a scale to deliver specialist housing (such as custom/self-build or provision for older people). This site forms part of the urban capacity for hemel hempstead and development in this location would reduce the need to deliver homes within the Green Belt.	
Social Infrastructure	The site is not of a scale which would deliver new social infrastructure facilities on site. Providers of these services have not raised fundamental capacity constraints regarding the development of this site, and development is expected to provide contributions to local services as required.	
Green Infrastructure	The site is within the catchment of an established SANG solution off-site. The development is expected to meet its needs for open space onsite and contribute towards offsite sport and leisure provision.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	The site has a low risk of flooding from all sources.	
Environmental	There are no identified ecological constraints associated with this site.	
Historic Environment	The site is located within an area of archaeological significance.	
Highways Impact	Development is likely to have an impact on the local road network at peak periods, including, Westwick Row and Green Lane. Enhancements to the road network would likely be required.	
Sustainable Transport	Site is situated within walking distance to frequent bus services 20 (Watford), 300 (St Albans), 302 (Welwyn Garden City), and 320 (Rickmansworth). The site is also located closely to bus stops which are serviced by the less frequent local circular routes H10 (Boxmoor/Town Centre) and ML1 (Station / Maylands). The site is located closely to the existing primary school, green space and sports facilities and Leverstock Green Local Centre.	
Access	The site has an existing access at Westwick Row; however, any site-specific policy should allow sufficient flexibility to allow this to be re-provided from an alternative location if this is preferred by the Highways Authority. Officers consider that site could be accessed from Green Lane.	

Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	<p>No major pipelines traverse the site. A power pole and line are located towards the northeastern corner of the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), 100% of the site is located within Source Protection Zone 3.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location would likely be able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 37)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	-	-	✓	✓	x	-	?	x	x	✓	✓	x	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
<p>The site was included in scenario testing as a constant across all reasonable alternative scenarios.</p> <p>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.</p>														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
<p>The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations. Specific justification of this site was set out in 5.4.10.</p>														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 80 dwellings.
---------------------------------------	--

2020 Justification (SSA04.5 pg.113-134)	The Urban Capacity Study (2020) identified that the site is suitable and viable with a reasonable prospect that the site could be made available during the period of the Local Plan.
2023 Recommendation (PCD01.1, page 7)	Site is proposed as an allocation for around 80 dwellings.
2023 Justification	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council's adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed as an allocation for around 80 dwellings.
2024 Justification	There is a clear strategic case to maximise urban capacity within Hemel Hempstead where these sites can deliver in the plan period. This is an available site which is located within the built-up area of Hemel Hempstead and has the potential to deliver early within the period of the Local Plan. The development potential of the site has been reduced in light of viability concerns relating to a higher density scheme, the planning permission for which has now lapsed.

## Hemel058 | Plots 2/3 Kier Park, Maylands Avenue

Description:	Two parcels of vacant scrub land, bounded by the Maylands Industrial estate to the north and east, and residential development to the west. The completed redevelopment of 'Plot 1' Kier Park is located to the south of the site, and includes a hotel, car park and restaurants. The site is located closely to the major junction between the A414 Dual Carriageway and A4147 Maylands Avenue and was promoted as a mixed-use gateway to the industrial area.
Capacity of site	HELAA: 234 dwellings and 1400 square metres of office floorspace Site promoter: 234 dwellings and 1400 square metres of office floorspace
HELAA conclusion	Deliverable: The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years

Housing & Economy	<p>The site is expected to deliver 1 and 2 bed apartments. The site is a sustainable location and forms part of the urban capacity of Hemel Hempstead. Development in this location would reduce the need to deliver homes within the Green Belt.</p> <p>The site is located within the Maylands General Employment Area; however, it has been vacant for c.15 years. Marketing undertaken by the site promoter confirmed that there was not sufficient demand to deliver a wholly employment led scheme on the site, therefore the development is expected to deliver a mixed-use scheme and include around 1400 square metres of offices, focussed on small startup businesses.</p>	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed.	
Green Infrastructure	This site is located within the catchment of established SANG solutions, including Westbrook Hay. As this site is an urban regeneration site it is unlikely to meet arising open space needs on site, but it is expected to provide high quality amenity green space, play provision and greening features on site, and provide contributions towards offsite sport and leisure provision.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	The site is wholly within Flood Zone 1. 18% of the site has a low risk of surface water flooding, 12% at medium risk, and 7% high (CSN04.2)]. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	There are no fundamental ecological constraints associated with this site, although Natural England noted there is an area of PHI deciduous woodland located closely to the site boundary, creating an opportunity for further enhancement.	
Historic Environment	The site does not have any identified heritage constraints, although the archaeology service at HCC identified a need to undertake preliminary investigations on the site.	



Highways Impact	Development is likely to have an impact on the local road network at peak periods including, Maylands Avenue, the A414 and Leverstock Green Way.	
Sustainable Transport	The site is located within walking distance to bus stops along Maylands Avenue, served by frequent bus services 20 (Watford), 302 (Welwyn Garden City), and 320 (Rickmansworth), and the less frequent local circular route ML1 (Station / Maylands).	
Access	The site has access onto Maylands Avenue. Access to new development should utilise the existing road through the site.	
Water and Wastewater	Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.  Wastewater: (CD10.4 Comment EGS12647) Thames Water raised that they do not envisage infrastructure concerns regarding wastewater network, however they confirmed the site is located upstream one of their assets, Maylands Balancing Pond.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	The site is located within a former land use risk zone associated with industrial works on the site and is located within Source Protection Zone 3.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	The site benefitted from a resolution to grant planning permission for a residential led, mixed use scheme. It is actively promoted for development and is located within the catchment of an established SANG solution. Officers consider this to be a deliverable site.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 36)															
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment	
-	-	?	✓	✓	✓	-	-	✓	✓	✓✓	✓	✓	?	✓	?
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)															
The site was included in scenario testing as a constant across all reasonable alternative scenarios. 5.4.12: the first port of call in terms of ‘new supply’ is two urban allocations. One of these sites (Kier Park) benefits from a resolution to grant permission.															
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)															

The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 250 dwellings.
2020 Justification (SSA04.5 pg. 165-166)	The Urban Capacity Study (2020) identified that the site is suitable, available and viable.
2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for 234 dwellings
2023 Justification	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council's adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed as an allocation for 234 dwellings
2024 Justification	There is a clear strategic case to maximise urban capacity within Hemel Hempstead, where these sites can deliver in the plan period. This is an available site which is located within the built-up area of Hemel Hempstead and has the potential to deliver early within the period of the Local Plan. The site also benefitted from a resolution to grant planning permission for a residential led, mixed use scheme.

### Pre-Submission considerations:

**Wastewater:** The Regulation 20 representation from Thames Water noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

**Viability and Deliverability:** A Regulation 20 Representation was received from an interested party in relation to part of the site requested further flexibility within the allocation, noting that the land was being marketed. Officers determined that the planning application on the site had not been withdrawn and that the site promoter had not requested the allocation to be amended or deleted through their representations.

**Post submission considerations:** The planning application which benefited from a resolution to grant permission was withdrawn on the 1<sup>st</sup> of October 2025.

Description	Vacant area of scrub land covered in hardstanding, which forms part of the larger mixed use allocation MU/1 in the Site Allocations DPD (adopted 2017). The site is bounded by new residential and civic/education development to the east and west, the Marlowes to the north (including healthcare uses, a church, restaurant and employment use) and the River Gade to the south.
HELAA conclusion	The review of existing allocations recommends that this is retained as an allocation for 200 dwellings within the emerging Local Plan (SSA01.3, page 28) as a deliverable site.

Housing & Economy	The site is expected to deliver apartments. It is unlikely to be of a scale to deliver specialist types of accommodation or larger properties with more than three bedrooms; however, it is likely to contribute to the need for one- and two-bedroom properties in the borough. The site is a sustainable location and forms part of the urban capacity of Hemel Hempstead. Development in this location would reduce the need to deliver homes within the Green Belt.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed in isolation. Hertfordshire County Council raised a requirement for a primary school to accommodate growth proposed in the wider Town Centre Opportunity Area, however CD03.1 noted that the identification of a primary school site at Hemel089 is likely to resolve this, subject to the site's suitability. The site will also be expected to deliver class E and F1 uses at the ground floor level, particularly on its frontage with the Marlowes.	
Green Infrastructure	This site is located within the catchment of SANG solutions owned and managed by Dacorum Borough Council (the site promoter) including Gadebridge Park. As this site is an urban regeneration site it is unlikely to meet arising open space needs on site, but it is expected to provide high quality amenity green space, play provision and greening features on site, and provide contributions towards offsite sport and leisure provision. There is also an opportunity to provide biodiversity enhancements near to the River Gade.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	96% of the site is within Flood Zone, 1% in Flood Zone 2 and 3% in Flood Zone 3b (CSN04.2). The areas in flood zones 2 and 3b are situated in the western part of the site adjacent to the River Gade, which is also subject to higher levels of surface water flood risk. Built development on this site can avoid areas of high flood risk, and any other risks are likely to be mitigated through more detailed analysis at the planning application stage. The site has been subject to, and passed the exception test (CSN13.1, Table 4.1) to site selection.	
Environmental	The River Gade, a priority chalk stream habitat, flows along the site boundary to the south. There are no other identified ecological constraints associated with this site.	

Historic Environment	There are five listed buildings within 100m located east of the site. Any development would need to conserve and enhance their setting.	
Highways Impact	Development is likely to have an impact on the local road network at peak hours, including Marlowes, Combe Street and Dacorum Way, although this is unlikely to be significant.	
Sustainable Transport	<p>The site is located within a short walking distance of the Marlowes Bus Interchange, which offers a wide selection of frequent bus services including the 1/1B to high Wycombe, 20 to Watford, 46 to Luton, 302 to St Albans/Welwyn Garden City, 322 to Rickmansworth and the 500/501 to Aylesbury, but also a range of local circular routes. The site is a 25–35-minute walking distance to Hemel Hempstead train station or a 10-15-minute cycle. The central location of the site is highly sustainable with good access to a range of services and facilities within the town centre.</p> <p>Development of this site would likely result in the provision and enhancement of new pedestrian and cycle connections within the town centre. There is also an opportunity to connect the part-finished footway towards of the south of the adjacent completed development (the Gade) alongside the river.</p>	
Access	Site has access onto Dacorum Way.	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the vicinity of the boundary of this site.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is partially located within a former land use risk zone associated with water works. 100% of the site is located within Source Protection Zone 1	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. However, BGS data identifies some potential sand and gravel deposits beneath the site, and the minerals authority encourage opportunistic extraction.	
Viability and deliverability	The site is allocated within the adopted development plan and is largely developed. It is owned and promoted by the Council and early-stage feasibility work has been undertaken to develop proposals for the site. The council is in the process of identifying an investment partner to assist in ‘unlocking housing sites’ <sup>8</sup> , with a focus on delivering town centre regeneration sites within the early stages.	

<sup>8</sup> <https://bidstats.uk/tenders/2024/W24/824377649>

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 37)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
-	?	?	✓	✓	✓	-	?	✓	✓	✓✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the ‘town centre opportunity area’ (5.4.13) for a total of 1,750 homes across multiple allocations.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 200 dwellings.
2020 Justification (SSA04.2 pg. 28)	The Urban Capacity Study Review of Existing Housing Allocations (2020) identified that the site should be retained as an allocation.
2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 200 dwellings.
2023 Justification (SSA02.3, page 28)	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council’s adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed as an allocation for around 200 dwellings.
2024 Justification (SSA01.3, page 28)	This site is allocated within the current adopted development plan, and the review of these allocations (SSA01.3) determined that, whilst the site is

	associated with a small area of flood risk on its western boundary, development can sequentially be located away from this and therefore it is justified that the allocation is retained within the Local Plan.
--	---

**Pre-Submission considerations:**

**Wastewater:** the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling may be required to determine if upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

**Post-Submission Considerations:** Dacorum Borough Council announced its partnership with the Hill Group<sup>9</sup> in August 2025 and is developing its first strategic business plan.

---

<sup>9</sup> <https://www.dacorum.gov.uk/home/all-news/2025/08/11/investment-partnership-to-deliver-affordable-new-homes-and-regeneration>

## Hemel081 | National Grid and 339-353 London Road

Description:	The site is made up of scrub land, which is largely vacant, aside from gas supply infrastructure on the eastern side. The site is bounded to the north by the A4251 London Road, to the east by the London Road Trade employment area. To the west is Stratford Way and the southern boundary is formed by the London Euston to Milton Keynes railway line and Harding's Close.
HELAA conclusion	The review of existing allocations recommends that this is retained as an allocation for 480 dwellings within the emerging Local Plan (SSA01.3, page 9) as a deliverable site.

Housing & Economy	The site is expected to deliver apartments. It is unlikely to be of a scale to deliver specialist types of accommodation or larger properties with more than three bedrooms; however, it is likely to contribute to the need for one- and two-bedroom properties in the borough. The site is a sustainable location and forms part of the urban capacity of Hemel Hempstead. Development in this location would reduce the need to deliver homes within the Green Belt.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed in isolation. Hertfordshire County Council raised objection in 2023 to the wider Two Waters Opportunity Area due to primary school capacity, however CD03.1 noted that the identification of a primary school site at Hemel117R is likely to resolve this, subject to the site's suitability.	
Green Infrastructure	This site is located within the catchment of established SANG solution at Westbrook Hay. As this site is an urban regeneration site it is unlikely to meet arising open space needs on site, but it is expected to provide high quality amenity green space, play provision and greening features on site, and provide contributions towards offsite sport and leisure provision.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	Site is wholly within Flood Zone 1. 10% of the site has a low risk of surface water flooding [CSN04.2]. Any risks are likely to be mitigated through more detailed analysis at the planning application stage. The site has a risk of groundwater flooding to subsurface assets, but it is unlikely for this to reach the surface level.	
Environmental	The site falls within the IRZ of Roughdown Common SSSI.	
Historic Environment	The site does not have any identified heritage constraints.	
Highways Impact	Development of this site would likely result in an increase in traffic to and from the site at peak hours. Enhancements to the road network would likely be required along London Road and Two Waters Road.	
Sustainable Transport	Site is situated within walking distance to bus services 302 (Stevenage/Welwyn Garden City), 1 (High Wycombe), 3 (Chaulden), 500/X500 (Aylesbury), H19 (Kings Langley), 322 (Rickmansworth), 207 (Long Marston).	



	The site is also 10–15-minute walking distance to Hemel Hempstead train station and 5-minute cycle. Development of this site would likely result in enhancements to the Grand Union Canal towpath.	
Access	The site has two existing main access points at London Road and one at Stratford Way (which is expected to deliver pedestrian access only if retained).	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the vicinity of the boundary of this site.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	<p>The site contains a gas pressure reducing station and several gas pipes, which is required to be retained on site, however a detailed risk assessment and remediation strategy has been provided as part of the planning application.</p> <p>No major power lines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	The site contains land use risk features associated with gas manufacture and distribution, and a hazardous substances buffer zone associated with the Health and Safety Executive. The site is not in a source protection zone; however, the site is located within a Source Catchment Area and overlies a Principal Aquifer, with the River Bulbourne approx. 30m from the northern boundary. It is expected any concerns can be mitigated through detailed remediation and drainage strategies, although measures identified may affect viability.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt.	
Viability and deliverability	The live planning application on the site contains detailed viability evidence which confirmed development is viable in this location, although the high level of costs associated with land remediation will likely reduce levels of affordable housing.	



SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality		SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy		SA15 Employment	
?	-	-	✓	✓	?	✓	-	?	✓	✓	?	✓✓	✓	✓	×	✓	×
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)																	
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the ‘two waters opportunity area’ (5.4.14) for a total of 2,000 homes across multiple allocations.																	
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)																	
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.																	

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 400 dwellings.
2020 Justification (SSA04.2 pg. 9)	The Urban Capacity Study Review of Existing Housing Allocations (2020) identified that the site should be retained as an allocation and increased the number from 350 to 400 dwellings, as the site has the potential to be further optimised.
2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 440 dwellings
2023 Justification (SSA02.3, page 9)	<p>The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council’s adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).</p> <p>The allocation was amended to increase the overall quantum of development to 440 dwellings to reflect the most up to date position on the site.</p>
2024 Recommendation	Site is proposed as an allocation for around 480 dwellings.
2024 Justification (SSA01.3, page 9)	This site is allocated within the current adopted development plan, and the review of these allocations (SSA01.3) determined that a planning application was received on the 21st of December 2023 for around 480 dwellings on this site (23/03028/MFA) and was in the process of being considered. Therefore, it is justified that the allocation is retained within the Local Plan.

	Officers amended the allocation to reflect the planning application and increased the quantum of residential to around 480 dwellings.
--	---

**Pre-Submission considerations:**

**Viability and Deliverability:** The live application for 476 apartments (23/03028/MFA) was refused on the 24<sup>th</sup> of December 2024 based on urban design considerations. Officers consider that a resubmitted scheme responding to the issues raised by the committee is likely to be positively determined in 2025, causing minimal impact to the trajectory of the site. A resubmitted application for 485 apartments was received on the 5<sup>th</sup> of March 2025 (25/00549/MFA).

**Wastewater:** the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling may be required to determine if upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

**Post-Submission Considerations:** Full planning permission for the resubmitted application (25/00549/MFA) was granted on the 29<sup>th</sup> of June 2025. An appeal lodged on the 8<sup>th</sup> of May 2025 for the previously refused scheme (APP/A1910/W/25/3363576) was withdrawn.

## Hemel084 | Paradise

Description:	Predominantly industrial area located behind Hemel Hempstead town centre.
HELAA conclusion	The review of existing allocations recommends that this is retained within the emerging Local Plan as an allocation for 350 dwellings (SSA01.3, page 31) with part of the site expected to deliver within the first 5 years and the remainder prior to 2041.

Housing & Economy	The site is expected to deliver apartments. It is unlikely to be of a scale to deliver specialist types of accommodation or larger properties with more than three bedrooms; however, it is likely to contribute to the need for one- and two-bedroom properties in the borough. The site is a sustainable location and forms part of the urban capacity of Hemel Hempstead. Development in this location would reduce the need to deliver homes within the Green Belt.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed in isolation. Hertfordshire County Council raised a requirement for a primary school to accommodate growth proposed in the wider Town Centre Opportunity Area, however CD03.1 noted that the identification of a primary school site at Hemel089 is likely to resolve this, subject to the site's suitability.  The site will also be expected to deliver class E and F1 uses at the ground floor level where this is viable.	
Green Infrastructure	This site is located within the catchment of SANG solutions (likely provision at Gadebridge Park). As this site is an urban regeneration site within multiple landownerships it is unlikely to meet arising open space needs on site, but it is expected to provide high quality amenity green space, play provision and greening features on site having regard to the adopted design code for the site, and provide contributions towards offsite sport and leisure provision.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	The site is wholly within Flood Zone 1. 9% of the site has a low risk of surface water flooding, 3% medium risk, and 9% high (CSN04.2). Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	1.1% of the site is priority habitat deciduous woodland and it is adjacent to a local wildlife site. There are no other identified ecological constraints associated with this site.	
Historic Environment	The site does not have any identified heritage constraints.	
Highways Impact	Development of this would likely result in an increase in traffic to and from the site at peak hours, including Park Lane, Wood Lane and the A141. Enhancements would likely be required, along Wood Lane and A414.	
Sustainable Transport	The site is a 5-minute walk to the Riverside bus interchange which offers a wide selection of bus services. The location of the site is highly sustainable with good access to a range of services and facilities within	

	the town centre. This site could contribute to measures to improve pedestrian and cycle access between the town centre, Hemel Hempstead station and Apsley/Two Waters.	
Access	The site has existing access points at Park Lane and Wood Lane.	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the vicinity of the boundary of this site.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is 100% located within a former land use risk zone associated with factory works on the site, with significant potential for land contamination.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	<p>Guided by the design code.</p> <p>The council notes that development on this site will come forward as individual plots of a smaller size due to the complex landownership structure of the site.</p>	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 36)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
?	-	-	✓	✓	✓	-	?	✓	✓	✓✓	✓	✓	✓	?
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the ‘town centre opportunity area’ (5.4.13) for a total of 1,750 homes across multiple allocations.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.														

## Summary of Officer Recommendations

2020 Recommendation	Site is proposed as an allocation for around 350 dwellings.
2020 Justification (SSA04.2 pg. 30)	The Urban Capacity Study Review of Existing Housing Allocations (2020) identified that the site should be retained as an allocation, with the boundary amended to remove any land which was under construction/completed. The number should be increased from 75 to 350 as the site has the potential to be optimised further.

2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 350 dwellings.
2023 Justification (SSA02.3, page 30)	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council's adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is proposed as an allocation for around 350 dwellings.
2024 Justification (SSA01.3, page 31)	This site is allocated within the current adopted development plan, and the review of these allocations (SSA01.3) determined that there are live planning applications on several parcels on the site, some with planning permission and some which have recently been developed. It is also noted within the review, that the site is in multiple ownerships and that development is being guided by the adopted Paradise Design Code SPD (April 2023). Therefore, it is justified that the allocation is retained within the Local Plan.

### Pre-Submission considerations:

**Wastewater:** the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required, and it is anticipated that upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

## Hemel085 | Marchmont Farm

Description:	The site is currently in agricultural use (both pastoral and arable). The site is bounded to the northeast by the Grovehill residential development, to the south by Link Road, to the west and northwest by agricultural land.
HELAA conclusion	The review of existing allocations recommends that this is retained as an allocation for 350 dwellings within the emerging Local Plan (SSA01.3, page 2) as a deliverable site.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including self/custom build. The site is also allocated to provide accommodation for gypsies and travellers.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed in isolation.	
Green Infrastructure	This allocation can provide an extension to Margaret Lloyd Park enabling it to become SANG which will support the development and wider needs. Provision of remaining green infrastructure typologies required on-site. Green walking links to connect site with Margaret Lloyd Park, Howe Grove Local Nature Reserve and HGC Programme Area required. Contributions towards offsite sport and leisure provision required.	
Landscape	The adopted masterplan for LA1 (2017) sets out requirements to screen edges and maintain an appropriate buffer with Piccotts End, based upon the landscape evidence base prepared to support the adopted Local Plan in 2012.	
Green Belt Evaluation	The site is not located within the Green Belt (removed in 2017).	
Flooding	Site is wholly within Flood Zone 1. 5% of the site has a low risk of surface water flooding, 2% medium risk, and 1% high [CSN04.2]. Any risks are likely to be mitigated through more detailed analysis at the planning application stage. This site has a risk of groundwater flooding to subsurface assets, but it is unlikely for this to reach the surface level.	
Environmental	The site is adjacent to the Howe Grove Wood Nature Reserve. There are no other identified ecological constraints associated with this site.	
Historic Environment	The site is located closely to the Piccotts End conservation area, which includes a number of listed buildings.	
Highways Impact	Development is likely to have an impact on the local road network. An approved access strategy would be required for the new point of access onto the A4147 Link Road.	
Sustainable Transport	The site is located closely to the Grovehill Washington Avenue Terminus which is served by regular bus services 3 and 4 (circular routes from Grovehill to Chaulden/Warners End), with the nearest stop 300m to edge of development. It is also a 10-minute walk to the Grovehill Local Centre.	
Access	Site is accessible from A4147 Link Road. To the north single track Piccotts End Lane provides access for pedestrians and cyclists.	
Water and Wastewater	Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.	

	Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	The site is located within source protection zone 2.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	The site is allocated within the adopted Local Plan and is subject to a live planning application which is at an advanced stage.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 37)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
?	?	-	✓	✓	x	-	-	x	✓	✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios as it is an existing greenfield allocation (5.4.12).														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 385 dwellings.
2020 Justification (SSA04.2 pg. 2)	The Urban Capacity Study Review of Existing Housing Allocations (2020) recommended to retain the allocation and increase from 350 dwellings to 385 to take account of recent application and the development potential of the Dacorum owned land which is to come forward.
2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 382 dwellings.
2023 Justification (SSA02.3, page 2)	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding



	the deliverability of the site, and the site could deliver a bespoke SANG solution tied to the adjacent Margaret Lloyd Park (which is owned and managed by Dacorum Borough Council) meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council's adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).
--	--

2024 Recommendation	Site is proposed as an allocation for around 385 dwellings.
2024 Justification (SSA01.3, page 2)	This site is allocated within the current adopted development plan and was removed from the Green Belt. The most recent review of these allocations (SSA01.3) determined that most of the site is subject to a live planning application (19/02749/MOA) for 350 dwellings, and a small area of land at the north of the site received planning permission in 2023 (22/01258/MFA) for 32 dwellings. Therefore, it is justified that the allocation is retained within the Local Plan.

#### **Pre-Submission considerations:**

**Site capacity:** The smaller parcel of land at the north of the site received planning permission and construction started on site in March 2024. The site boundary within CD01.1 Policy Hm14 was changed to reflect this, however the policy text requires a minor factual correction to revert the allocation to 350 dwellings, to reflect the change to the site boundary.

**Post Submission matters to note:** Planning application (19/02749/MOA) received an updated resolution to grant permission subject to S106. This updated position takes account of the need to deliver SANG mitigation.



Description:	An area of public green space bounded to the east and south by residential neighbourhoods, and to the west by Fletcher Way
HELAA conclusion	The review of existing allocations recommends that this is retained as an allocation for 90 dwellings within the emerging Local Plan (SSA01.3, page 3) as a developable site.

Housing & Economy	The site is expected to deliver apartments to contribute to the need for one- and two-bedroom properties in the borough. It is unlikely to deliver specialist types of accommodation or larger properties with more than three bedrooms.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed in isolation.	
Green Infrastructure	This site is located within the catchment of SANG solutions owned and managed by Dacorum Borough Council (the site promoter) including Gadebridge Park. The development is expected to meet its needs for open space onsite and contribute towards offsite sport and leisure provision.	
Landscape	The adopted masterplan for LA2 (2017) sets out requirements to retain trees and maintain an area of open space on higher parts of the site, based upon the landscape evidence base prepared to support the adopted Local Plan in 2012.	
Green Belt Evaluation	The site is not located within the Green Belt (removed in 2017).	
Flooding	Site is wholly within Flood Zone 1. 7.8% of the site has a low risk of surface water flooding, 2.8% medium risk, and 0.9% high [CSN04.2]. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	The site is located within 300m from the Howe Grove Wood Nature Reserve. There are no other identified ecological constraints associated with this site.	
Historic Environment	The site is adjacent to the Old Town Conservation Area with a number of listed buildings.	
Highways Impact	Development is likely to have an impact on the local road network. Enhancements to the road network would likely be required along Fletcher Way and Queensway Roundabout.	
Sustainable Transport	The site is located closely to bus stops on Townsend served by frequent services 3 and 4 (circular routes from Grovehill to Chaulden/Warners End). The site is located closely to the Old Town High Street and Gadebridge Park (both within a 5-minute walk), which lead to Hemel Hempstead town centre within 15 minutes.	
Access	The site can be accessed via Fletcher Way, with pedestrian footpaths. Public rights of way traverse the edge of the site to both the east and south.	
Water and Wastewater	Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the boundary of this site.	

	Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	The site is located within Source Protection Zone 1.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	The site is allocated within the adopted development plan and is largely developed. It is owned and promoted by the Council and early-stage feasibility work has been undertaken to develop proposals for the site. The council is in the process of identifying an investment partner to assist in 'unlocking housing sites' <sup>10</sup> .	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 37)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	-	-	✓	✓	x	-	?	x	✓	✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios as it is an existing greenfield allocation (5.4.12).														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.														

## Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 90 dwellings.
2020 Justification (SSA04.2 pg. 3)	The Urban Capacity Study Review of Existing Housing Allocations (2020) recommended to retain the allocation and increase from 80 dwellings to 90, as the site has potential to be further optimised.

<sup>10</sup> <https://bidstats.uk/tenders/2024/W24/824377649>

2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 90 dwellings
2023 Justification (SSA02.3, page 3)	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council's adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5

2024 Recommendation	Site is proposed as an allocation for around 90 dwellings
2024 Justification (SSA01.3, page 3)	This site is allocated within the current adopted development plan and was removed from the Green Belt. The review of these allocations (SSA01.3) determined that the Council is actively looking to progress the site during the period of the Local Plan, therefore it is justified that the allocation is retained within the Local Plan.

**Post-Submission Considerations:** Dacorum Borough Council announced its partnership with the Hill Group<sup>11</sup> in August 2025 and is developing its first strategic business plan.

---

<sup>11</sup> <https://www.dacorum.gov.uk/home/all-news/2025/08/11/investment-partnership-to-deliver-affordable-new-homes-and-regeneration>

## Hemel089 | Hemel Hempstead Hospital

Description	Large brownfield site located to the east of Hemel Hempstead town centre, currently being used for local hospital facilities, surrounded by built residential and retail development. The site contains many vacant buildings. The site boundary also includes an area of open space which is bounded by the paradise fields local wildlife site to the south.
HELAA conclusion	The review of existing allocations recommends that this is retained as an allocation for 450 dwellings within the emerging Local Plan (SSA01.3, page 30) as a developable site.

Housing & Economy	The site is expected to deliver apartments which primarily contribute to the need for one- and two-bedroom properties in the borough. The site is of a sufficient scale to deliver housing for older people. Development in this location would reduce the need to deliver homes within the Green Belt.	
Social Infrastructure	The site is of a scale that could deliver additional community facilities for Hemel Hempstead, including a primary school which would unlock growth at this site and other town centre regeneration sites. The NHS ICB raised capacity constraints at Fernville surgery. It is expected if GP services could not be delivered at the Health Campus site (Hemel003) that these should be provided on this site if required.	
Green Infrastructure	This site is located within the catchment of SANG solutions, including Gadebridge Park. The site is expected to meet its requirement for open space on site and provide contributions towards offsite sport and leisure provision. There are opportunities to secure community use of sports provision at education facilities on the site.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	Site is wholly within Flood Zone 1. 4% of the site is at a low risk of surface water flooding, with 1% at a medium risk [CSN04.2]. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	6.1% of the site is priority habitat deciduous woodland, and there are 6 tree preservation orders, however it is considered that the site is large enough that the retention of these assets would not constrain development. It is also adjacent to the paradise fields local wildlife site.	
Historic Environment	The grade II listed Tile Mosaic Map (Emett Mosaic) is located 100m to the northwest of the site.	
Highways Impact	Development of this site would likely to impact the local road network and key routes that radiate from the town centre, albeit its existing use as a hospital means the net impact is less. The town centre and hospital services are trip attractors to part of Hemel Hempstead. Modal shift measures would be required to encourage the uptake of sustainable transport.	
Sustainable Transport	Extensive bus services are available close by from the Marlowes bus interchange (around 300m) and town centre bus stops. Hemel Hempstead Station is within a 30-minute walk. This site could contribute	

	to measures to improve pedestrian and cycle access between the town centre, Hemel Hempstead station and Apsley/Two Waters.	
Access	Site has existing access onto the highway network from Hillfield Road, with further connections at Park Lane, Maynard Road and King Harry Street. A public right of way runs north - south across the site, between the eastern parcel and main part of the site.	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the vicinity of the boundary of this site.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is 100% located within a former land use risk zone associated with the hospital, with potential for land contamination. 40% of the site is located within Source Protection Zone 2.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	<p>The viability assessment (IDV03.1) concluded that the percentage of affordable homes delivered in wholly flatted development in Hemel Hempstead should be set at 25% within policy to maintain viability of these developments.</p> <p>Delivery of this site is dependent on the proposals for site Hemel003, and existing hospital uses on the site would have to relocate into a new building prior to demolition, however it is noted there are many vacant buildings on the site which could be demolished to deliver homes on the site earlier. If proposals for Hemel003 are not approved, the site will revert back to the original site promotion of 450 homes, a primary school and retained hospital facilities on site.</p>	

SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
?	-	-	✓	✓	✓	-	-	✓	✓	✓✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the ‘town centre opportunity area’ (5.4.13) for a total of 1,750 homes across multiple allocations.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 450 dwellings
2020 Justification (SSA04.2 pg. 29)	Retain allocation, exclude the existing area of public open space, which is to be retained, and increase the number to around 450 dwellings as the site has potential to be optimised further.
2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 450 dwellings
2023 Justification (SSA02.3, page 29)	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site, and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council’s adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed as an allocation for around 450 dwellings
2024 Justification (SSA01.3, page 29)	This site is allocated within the current adopted development plan, and the review of these allocations (SSA01.3) determined that, ongoing discussions with the NHS have indicated that they remain actively interested in bringing forward development on this site and there remains a reasonable prospect that development will come forward in the plan period, therefore it is justified that the allocation is retained within the Local Plan.

## **Pre-Submission Considerations**

**Wastewater:** the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required, and it is anticipated that upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

## Hemel090 | Hemel Hempstead Station Gateway

Description:	The site is occupied by the train station and station forecourt area including bus stop and taxi rank, commercial uses including an industrial unit, restaurant and former car showroom, and surface car parking for about 500 vehicles. The site is bounded by London Road and the Station Moor to the north and west, the railway line to the south and residential properties to the east.
HELAA conclusion	The review of existing allocations recommends that this is retained as an allocation for 390 dwellings within the emerging Local Plan (SSA01.3, page 33) as a deliverable site.

Housing & Economy	The site is expected to deliver apartments which contribute to the need for one- and two-bedroom properties in the borough. Development in this location would reduce the need to deliver homes within the Green Belt. The site is also expected to deliver other uses that are ancillary to the main use of the site as a strategic transport hub at the ground floor level.	
Social Infrastructure (including, where relevant, Education, Health, Community Facilities and Emergency Services)	The site will result in the regeneration of the train station which will benefit existing and new communities alike. Hertfordshire County Council raised objection in 2023 to the wider Two Waters Opportunity Area due to primary school capacity, however CD03.1 noted that the identification of a primary school site at Hemel117R is likely to resolve this, subject to the site's suitability.	
Green Infrastructure	This site is located within the catchment of established SANG solution at Westbrook Hay. As this site is an urban regeneration site it is unlikely to meet arising open space needs on site, but it is expected to provide high quality amenity green space, play provision and greening features on site, and provide contributions towards offsite sport and leisure provision.	
Landscape	The site is located within the built-up area of Hemel Hempstead. There are some landscape sensitivities, in particular with the adjacent Box Moor common.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	Site is wholly within Flood Zone 1. Low surface flood risk is present to a short flow path within the north of the site. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	The site is located within 800m of the Roughdown Common SSSI. The site falls within the IRZ of Roughdown Common SSSI and there is deciduous priority woodland near the site.	
Historic Environment	Part of the western area of the site is located within an area of archaeological significance tied to roman remains. The potential of the site takes account of this.	
Highways Impact	Development of this site would likely to impact the local road network and key routes that radiate from Hemel Hempstead Station.  It also supports the regeneration of the existing train station.  The site promoter has confirmed that the development of the multi storey car park would be provided early to ensure the function of the train station is not disrupted.	



Sustainable Transport	Extensive bus services are available from the station forecourt and nearby bus stops on London Road. The town centre is within a 20-minute walk. The site has the potential to deliver an upgraded station facility and a strategic transport hub that provides high quality walking, cycling and public transport connections to key areas of Hemel Hempstead. Further measures to facilitate sustainable transport use, including enhancements to London Road and contributions to improvements to connecting pedestrian and cycle routes would also be provided.	
Access	This site has existing access onto the highway network from A4251 London Road. Public rights of way link the edge of the site, leading north across the Moors and towards the town centre, and south to residential areas.	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the boundary of this site.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	The site is located within several former land use risk zones, including a petrol station, former coal yard and railway operations. 31% of the site is located within Source Protection Zone 2. The site is located adjacent to the railway line.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	The viability assessment (IDV03.1) concluded that the percentage of affordable homes delivered in wholly flatted development in Hemel Hempstead should be set at 25% within policy to maintain viability of these developments. The site is allocated within the adopted development plan, and a developer has been appointed by the landowner following a period of consultation in 2020.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 36)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment

?	-	-	✓	✓	×	✓	-	?	?	✓	?	✓✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)																
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the ‘two waters opportunity area’ (5.4.14) for a total of 2,000 homes across multiple allocations.																
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)																
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.																

## Summary of Officer Recommendations

2020 Recommendation (PCD05.2, pg. A3)	Site is proposed as an allocation for around 350 dwellings.
2020 Justification (SSA04.2 pg. 31)	The Urban Capacity Study Review of Existing Housing Allocations (2020) identified that the site should be retained as an allocation with the number increased from 200 dwellings to 350 as the site has the potential to be optimised further.
2023 Recommendation (PCD01.1, page 6)	Site is proposed as an allocation for around 360 dwellings.
2023 Justification (SSA02.3, page 31)	The officer recommendation to allocate this site remained unchanged in 2023. There were no changes in relation to the conclusions made in 2020 regarding the deliverability of the site (noting the site has the potential to be optimised further), and this was also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council’s adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed as an allocation for around 390 dwellings
2024 Justification (SSA01.3, page 33)	<p>This site is allocated within the current adopted development plan, and the review of these allocations (SSA01.3) determined that, there is active interest in bringing forward this site in the short/medium term and a planning application is expected to be submitted prior to adoption of the Local Plan, therefore it is justified that the allocation is retained within the Local Plan.</p> <p>Following discussion with the promoters of the site, the development potential can be increased to approximately 390 dwellings to reflect the most up to date position of the site.</p>

## Pre-Submission considerations:

**Wastewater:** the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling may be required to determine if upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

Description	A retail area including shops, restaurants, a hotel, gym, bus interchange and multistorey car park. The site is largely dominated by the vacant Debenhams building at the southwest of the site. The site is bounded by Moor End Road and the Water Gardens to the north, The Marlowes and Selden Hill to the southeast, the Plough Roundabout to the south and the Leighton Buzzard Road to the west.
Capacity of site	HELAA: 311 Site promoter: 500
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is expected to deliver apartments which contribute to the need for one and two-bedroom properties in the borough. Development in this location would reduce the need to deliver homes within the Green Belt. The site is also expected to deliver main town centre uses at ground floor level.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed in isolation. Redevelopment of the site will likely result in a loss of retail floorspace, particularly on upper floors. This needs to be balanced with the lack of market demand for such a large scale 'anchor' unit and the need to review its current use. Hertfordshire County Council raised a requirement for a primary school to accommodate growth proposed in the wider Town Centre Opportunity Area, however CD03.1 noted that the identification of a primary school site at Hemel089 is likely to resolve this, subject to the site's suitability.	
Green Infrastructure	(HELAA 1.3 ha 311) SANG strategy document demonstrates sufficient supply within catchment of development (Gadebridge Park indicated as likely provision). Urban regeneration site unlikely to meet arising open space needs. High quality greening features required to improve environmental conditions and create green social and activity spaces. Contributions towards offsite sport and leisure provision required.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	18% of the site is in Flood Zone 3b, 1% in Flood Zone 3a [CSN04.2]. The areas in flood zones 3a and 3b are situated next to the River Gade which runs through the middle of the site. Areas of higher surface flood risk are also present here and on the western boundary of the site. This site has a high risk of groundwater flooding to both surface and subsurface assets. The site has been subject to, and passed the exception test (CSN13.1, Table 4.1) to site selection.	
Environmental	The River Gade flows through the site. The site falls within the IRZ of Roughdown Common SSSI	
Historic Environment	The site is located within 100m of the Grade II listed Water Gardens registered park.	

Highways Impact	Development of this site would likely to impact the local road network and key routes that radiate from the town centre, although the impact is reduced due to the car park that already exists. Site's location provides opportunity for sustainable development, through bus, walking and cycling connections to Hemel Hempstead train station and other key destinations. Modal shift measures would be required to overcome barriers to walking/cycling and encourage the uptake of sustainable transport.	
Sustainable Transport	Site is well connected local services and transport links. Bus services available from Riverside, Waterhouse Street and further extensive services available within the town centre. Hemel Hempstead Station is within a 20-minute walk. Development would be expected to contribute towards an upgrade to the Riverside bus facilities and improve pedestrian and cycle access between the town centre, Hemel Hempstead station and Apsley/Two Waters.	
Access	The site has existing access onto the local road network from Moor End Road and Selden Hill. Further pedestrian access is available from the Marlowes/Riverside pedestrianised area, with bridge access across the River Gade. Pedestrian navigation across the road network/Plough Roundabout to the south is provided through signalised crossings and footbridge across Leighton Buzzard Road and subways under the Plough Roundabout.	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the vicinity of the boundary of this site.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site contains a small area of former land use risk zone associated with the historic corn mill and metal foundry near to the site.	
Minerals and Waste Considerations	The proposed site allocation falls outside of the Sand and Gravel Belt. However, BGS data identifies potential sand and gravel deposits beneath most of the site. The Minerals Planning Authority encourage opportunistic extraction for the site.	
Viability and deliverability	The viability assessment (IDV03.1) concluded that the percentage of affordable homes delivered in wholly flatted development in Hemel Hempstead should be set at 25% within policy to maintain viability of these developments.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1)
This site was not promoted for development at the time of preparing this document.
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the ‘town centre opportunity area’ (5.4.13) for a total of 1,750 homes across multiple allocations.
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.

### Summary of Officer Recommendations

2020 Recommendation	N/A
2020 Justification	This site was not promoted for development at the time.

2023 Recommendation (PCD01.1, page 7)	Site is proposed as an allocation for around 500 dwellings.
2023 Justification	<p>The site should be introduced as a proposed allocation for 500 dwellings, as this is an available brownfield site with high levels of accessibility to existing services, facilities, and public transport connections. The site is currently dominated by the vacant Debenhams department store.</p> <p>It is also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council’s adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).</p>

2024 Recommendation	Site is proposed as an allocation for around 500 dwellings
2024 Justification	<p>The officer recommendation to allocate this site remained unchanged in 2024, as there is a clear strategic case to maximise urban capacity within Hemel Hempstead, and this is an available brownfield site, in a highly sustainable location. The redevelopment of this site forms a key part of the vision for regenerating Hemel Hempstead town centre.</p> <p>It is considered that the potential environmental, heritage and flooding constraints identified through the Revised Strategy for Growth 2023 Regulation 18 would not preclude the redevelopment of this site, and that these are likely to be mitigated through detailed design considerations.</p>

### Pre-Submission considerations:

**Wastewater:** the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required, and it is anticipated that upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

## Hemel099 | Apsley Mills Retail Park

Description:	The site consists of an out of centre retail park primarily for homeware and bulky goods and surface level car parking. The site is bounded by surface level car parking for Sainsburys to the northwest, the grand union canal to the northeast, residential development to the southeast and London Road to the southwest.
Capacity of site	HELAA: 658 Site promoter: 500
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is expected to deliver apartments which contribute to the need for one- and two-bedroom properties in the borough and is of a sufficient scale to deliver housing for older people. Development in this location would reduce the need to deliver homes within the Green Belt.	
Social Infrastructure (including, where relevant, Education, Health, Community Facilities and Emergency Services)	The site is not of a scale that is expected to deliver social infrastructure on site but is unlikely to cause significant strain on the capacity of local services if developed in isolation. Redevelopment is expected to deliver active uses at ground floor level to support the local community. Hertfordshire County Council raised objection in 2023 to the wider Two Waters Opportunity Area due to primary school capacity, however CD03.1 noted that the identification of a primary school site at Hemel117R is likely to resolve this, subject to the site's suitability.	
Green Infrastructure	This site is located within the catchment of established SANG solutions, including Westbrook Hay. As this site is an urban regeneration site it is unlikely to meet arising open space needs on site, but it is expected to provide high quality amenity green space, play provision and greening features on site, and an improved publicly accessible along the canal and River Gade corridor. Development will be required to provide contributions towards offsite sport and leisure provision.	
Landscape	The site is located within the built-up area of Hemel Hempstead.	
Green Belt Evaluation	The site is not located within the Green Belt.	
Flooding	99% of the site is within Flood Zone 1. 1% of the site is situated in Flood Zone 3b. 24% of the site has a low risk of surface water flooding, 6% medium risk, and 6% high risk [CSN04.2]. Areas of surface water flood risk are concentrated in the northern and central parts of the site. On this site there is a risk of groundwater flooding to both surface and subsurface assets. The site has been subject to, and passed the exception test (CSN13.1, Table 4.1) to site selection.	
Environmental	According to the 2024 HELAA Update (SSA01.1), the site is adjacent to the Grand Union Canal. The site falls within the IRZ of Roughdown Common SSSI.	
Historic Environment	There are three Grade II listed buildings located within 100m of the site.	
Highways Impact	Development of this site would likely to impact the local road network, however it already is subject to a high level of vehicular movement as a result of its existing use as a retail park.	



Sustainable Transport	<p>Site's location provides opportunity for sustainable development, through bus, walking and cycling connections to Apsley train station and other key destinations. Maximising uptake of sustainable modes and minimising car trips will be especially important, due to proximity to AQMA and existing congestion on A4251 London Road.</p> <p>The site is well located to local services and transport links. Apsley train station is within 500m and bus services 322 H19 are available from a stop on the access road into the Apsley retail area. Development would be expected to deliver improved access to the Grand Union Canal, including a pedestrian route along the offside bank of the canal that adjoins the site. In addition to pedestrian and cycle links this will include a mobility hub, highway junction improvements and highway calming measures.</p>	
Access	<p>The site has existing access onto the highway network from A4251 London Road, and pedestrian footway that adjoins the southwest of the site. The Grand Union Canal runs along the northeastern boundary, with the towpath on the far bank. To the north of the site, a footbridge carries a public right of way across the canal, linking the towpath to the Apsley retail area. Pedestrian access across A4251 London Road in the vicinity of the site is limited to pedestrian refuges in the middle of the road at junctions. A signalised pedestrian crossing is available to the southeast that provides access towards Apsley Station.</p>	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the vicinity of the boundary of this site.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	<p>According to the 2024 HELAA Update (SSA01.1), the site is within 800 metres of the Lawn Lane AQMA and the London Road Apsley AQMA. The site is 100% located within a former land use risk zone associated with the historic paper mill operations, with a high potential for land contamination. 100% of the site is located within Source Protection Zone 3.</p>	
Minerals and Waste Considerations	<p>The proposed site allocation falls outside of the Sand and Gravel Belt. However, BGS data identifies potential sand and gravel deposits beneath most of the site. The Minerals Planning Authority encourage opportunistic extraction for the site.</p>	
Viability and deliverability	<p>The viability assessment (IDV03.1) concluded that the percentage of affordable homes delivered in wholly flatted development in Hemel</p>	

	Hempstead should be set at 25% within policy to maintain viability of these developments.	
--	---	--

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1)
This site was not promoted for development at the time of writing this document.
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the ‘two waters opportunity area’ (5.4.14) for a total of 2,000 homes across multiple allocations.
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)
The site was included in scenario testing as a constant across all reasonable alternative scenarios and was considered as part of the non-green belt supply in Hemel Hempstead (5.4.9) for a total of c.3,700 homes across multiple allocations.

### Summary of Officer Recommendations

2020 Recommendation	N/A
2020 Justification	This site was not promoted for development.

2023 Recommendation (PCD01.1, page 7)	Site is proposed as an allocation for around 450 dwellings
2023 Justification	<p>The site should be introduced as a proposed allocation for 450 dwellings, as this is an available brownfield site with high levels of accessibility to existing services, facilities, and public transport connections.</p> <p>It is also within catchment of a Council-led SANG solution, meaning officers could be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated in accordance with the Council’s adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).</p>

2024 Recommendation	Site is proposed as an allocation for around 500 dwellings and Class E and F1 uses at ground floor level where viable
2024 Justification	<p>The officer recommendation to allocate this site remained unchanged in 2024, although suggestions to increase the capacity of the site have been reflected within the Pre-Submission version of the Local Plan. There is a clear strategic case to maximise urban capacity within Hemel Hempstead, and this is an available brownfield site, in a highly sustainable location. The redevelopment of this site forms part of the wider Two Waters Opportunity Area.</p> <p>It is considered that potential constraints identified through the Revised Strategy for Growth 2023 Regulation 18 consultation would not preclude the redevelopment of this site, and that these are likely to be mitigated through detailed design considerations.</p> <p>The site will become available for development during the later stages of the period of the Dacorum Local Plan to 2041.</p>



**Pre-Submission considerations:**

Wastewater: the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required, and it is anticipated that upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

## Hemel113R | Polehanger Lane

Description	Primarily agricultural land, bounded by the east by woodland and open space, to the south by Polehanger Lane and Fennycroft Road, and the built-up area of hemel hempstead, to the west by Berkhamsted Road and to the north by small scale employment development and agricultural land.
Capacity of site	HELAA: 850 Site promoter: 750
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including provision for older people and self/custom build. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing.	
Social Infrastructure	The site is of a scale that could deliver additional community facilities for Hemel Hempstead, including a new local centre and primary school.	
Green Infrastructure	The site can deliver a bespoke SANG on site towards the northern boundary on land which was noted in CSN10.1 as having a higher level of landscape sensitivity. The site is expected to meet its requirement for open space and sports provision on site. There are opportunities to secure community use of sports provision at education facilities on the site.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have moderate-high landscape sensitivity. The HELAA 2024 (SSA01.4) considered that the site is not within the Chilterns National Landscape but may impact its setting due to proximity, noting that the southwest part of the site is located across an elevated plateau and the northern and central parts of the site are located across a valley.	
Green Belt Evaluation	<p>The Stage 2 Green Belt Study (2016) identifies that most of the site forms part of a larger parcel (HH-A5) which is considered to contribute strongly to the purposes of the Green Belt. The area of the site proposed for residential development is smaller than the parcel, and so it could be concluded that its contribution to the purposes of the Green Belt would be less than stated in the study.</p> <p>The Stage 3 Green Belt Study recommended boundary strengthening to the north-west and north-east, however the boundary of the site was revised in 2023, with the proposed developable extent set behind the area of ancient woodland to the east which acts as a strong visible barrier, and PROW 018 to the north which could be strengthened through the provision of planting.</p>	
Flooding	Site is wholly within Flood Zone 1.	
Environmental	The site contains 4 tree preservation orders which are expected to be retained through development. There is an area of ancient woodland adjacent to the site (not included within the site area), and the site is located closely to the Halsey Fields Wildlife site.	

Historic Environment	The site is located adjacent to a Grade II listed building (Boxted Dairy Farmhouse). Officers consider this could be dealt with through careful design and masterplanning, particularly through Green Belt boundary strengthening along PROW 018.	
Highways Impact	Development is likely to have an impact on the local road network at peak periods, including Polehanger Lane and Berkhamsted Road.	
Sustainable Transport	Site is within reasonable distance to local bus services of the 3 and 4, which both run every half an hour. Development of this site has the potential to contribute towards an enhanced public transport network in Hemel Hempstead including a new bus loop serving the site and a new mobility hub, alongside new/enhanced walking and cycling connections in this area.	
Access	New access could be provided via Berkhamsted Road. The site is accessible from Polehanger Lane however this is unlikely to be suitable for vehicular access but could serve as pedestrian/cycle and emergency access.	
Water and Wastewater	Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.  Local upgrades may be required to ensure sufficient capacity is available ahead of development.	
Other Utilities	The site contains no major pipelines. Two minor electricity powerlines traverse the site.  No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	The site is underlain by a Principal Aquifer, 74% of the site is located within Source Protection Zone 2 and 26% in Source protection zone 3. The site is located within a radon affected area with a radon potential band of 3-5%, requiring the adoption of basic radon protective measures for new developments.	
Minerals and Waste Considerations	Site is not located in a Mineral Safeguarding Area.	
Viability and deliverability	This site has been assessed to be viable against the proposed policy requirements of the emerging Local Plan.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 36)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	-	? ✓	?	x	?	?	x	✓ x	✓	✓	✓✓	✓	✓

Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)
Included in scenario testing as a variable in scenario 1 as part of a wider expansion to the northwest. This scenario performed poorly when assessed against the SA framework (table 6.2, page 69)
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)
Included in scenario testing and progressed as a variable in scenario 1, 2, 3, 7, 8, 9 and 10. The justification for this is set out in paragraph 5.4.17, noting that “there is an increased case for allocation on account of reduced supply from HGC and the urban area, plus the promoters submitted a detailed consultation response in 2023 such that there is confidence that the site can deliver a bespoke SANG (with spare capacity to support ~300 homes beyond the site) and a primary school”. This site formed part of the Council’s preferred scenario 7 (7.1.1).

## Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B49)	Site is not proposed as an allocation.
2020 Justification (PCD05.3, pg. B49)	Site performs well on a number of identified constraints, many of which are likely to be sufficiently mitigated through development. Officers agree with the AECOM Site Assessment Study recommendation that the eastern part of the site is unsuitable for development due to the presence of Local Wildlife Sites and Ancient Woodland. Excluding this area also prevents development from encroaching on the Gade valley and its many landscape and heritage assets. The impact on the setting of the listed building to the west of the site is likely to be mitigated through careful design and masterplanning. Officers consider that while the site performs well in general, on balance, there are other sites which are more suitable to deliver the strategy of the new Local Plan, including the potential to maximise sustainable transport modes and the delivery of new infrastructure to meet existing and future needs.
2023 Recommendation	Site is not proposed as an allocation.
2023 Justification	The officer recommendation to allocate this site remained unchanged in 2023. The site could not be considered further as it was not within a catchment of a Council-led SANG, and the site promoter did not have a bespoke SANG solution at the time, meaning officers could not be satisfied that any impacts on the CBSAC associated with the development would be sufficiently mitigated. The Council’s approach here was in accordance with the adopted SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed as an allocation for around 750 homes.
2024 Justification	Representations provided from the site promoter respond to concerns raised by officers during the 2020 and 2023 site assessment process, as these set out that the site can deliver a bespoke SANG on-site within areas of high landscape sensitivity and this avoids development on the eastern parcel adjacent to the wildlife site (as recommended within PCD05.1 and SSA03.3).  Whilst the wider assessment parcel (HH-A5) is judged to make a strong contribution to the purposes of the Green Belt overall, specifically purpose C (with a moderate contribution to A and B), officers consider the proposed

	<p>developable area is contained by existing features and it is able to deliver significant compensatory improvements to the parts of the site remaining within the Green Belt in the same ownership.</p> <p>Having regard to alternative sites, officers contend that the allocation of Polehanger Lane offers sustainability benefits over other sites which are assessed to contribute to a lesser level to the purposes. The site is located within Hemel Hempstead (the top of the settlement hierarchy), and it enables a scale of development which meets the wider objectives of the spatial strategy. It will provide new infrastructure including a primary school and community facilities, sustainable transport improvements, and specialist types of housing to meet identified needs.</p>
--	--

#### **Pre-Submission considerations:**

Wastewater: the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required, and it is anticipated that upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

**Post submission considerations:** An outline planning application submitted (25/01742/MOA) for up to 750 dwellings, a neighbourhood centre comprising up to 1000 sqm Class E/ F2 floorspace, two form entry primary school, Public Open Space, Suitable Alternative Natural Greenspace, associated infrastructure and engineering works was validated in July 2025.

## Hemel116R | Red Lion Lane

Description:	The site is an area of green space, bounded by Red Lion Lane and residential development to the north, Lower Road to the east, and the Grand Union Canal to the west, with a scaffolding company and site Hemel126R to the south
Capacity of site	HELAA: 45 Site promoter: 150
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including self/custom build.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site.	
Green Infrastructure	The development is within the catchment of SANGs serving the settlement. Development would be expected to meet its needs onsite and contribute towards offsite sport and leisure provision.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have low landscape sensitivity. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (HH-A12) which is considered to contribute moderately to the purposes of the Green Belt. This site is much smaller than the parcel. The study recommended that parcel HH-A12 is modified to exclude the land west of Lower Road (including this site) due to its importance in preventing coalescence between Hemel Hempstead and Kings Langley and ribbon development along Lower Road.	
Flooding	22% of the site is within in Flood Zone 2. 66% of the site has a low risk of surface water flooding, with 28% at a medium risk and 17% high. On this site there is a risk of groundwater flooding to both surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally, this may emerge at significant rates in certain areas and has the capacity to flow overland and/or pond within any topographic low spots.	
Environmental	2.62% of the site is within the Grand Union Canal/River Gade local wildlife site to which it is adjacent.	
Historic Environment	There are three Grade II listed buildings within 100m of the site.	
Highways Impact	Development of this site would likely result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network, when compared to alternatives.	
Sustainable Transport	Site is within reasonable distance to the 500-bus service to Watford and Aylesbury. Site is also in reasonable distance (15 min walk) to Apsley train station. Development of the site could contribute towards public transport enhancements in the area.	
Access	Existing access is available from Lower Road.	
Water and Wastewater	Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.	

	Wastewater: Local upgrades may be required to ensure sufficient capacity is available ahead of development.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is located within 50m of the former land use risk zone associated with the former refuse disposal. The site is underlain by a Principal Aquifer and 100% of the site is located within Source Protection Zone 3.	
Minerals and Waste Considerations	The site is located within the Sand & Gravel Mineral Safeguarding Area.	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location are viable and able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 36)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
?	?	?	✓	✓	×	?	?	?	?	✓	-	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
This site was considered within the ISA, but was not included within any of the reasonable alternative scenarios or progressed to scenario testing (5.4.26) due to surface water flood risk, although the ISA did note that “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”.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
Included in scenario testing and progressed as a variable in scenario 1, 2, 3 and 10. The justification for this is set out in paragraph 5.4.20, although this notes Green Belt constraints, surface water flooding and adjacent local wildlife site, and the lack of a SANG solution. This site did not form part of the Council’s preferred scenario 7 (7.1.1).														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B53)	Site is not proposed as an allocation.
2020 Justification (PCD05.3, pg. B53)	Site performs well on a number of identified criteria, with the majority of identified constraints likely to be sufficiently mitigated through development. Flood risk is a particular constraint to development of this site. The flood maps for this area have been updated since the Site Assessment Study was completed, and demonstrates that while fluvial flood risk has decreased (i.e.

	Flood Zones 2 and 3), surface water flooding remains an issue for the vast majority of the site. Sequentially, officers consider that there are more appropriate sites outside of the built up area of the six main settlements that are capable of delivering the strategy, and therefore is not recommended as an allocation.
--	---

2023 Recommendation	Site is not proposed as an allocation.
2023 Justification	Officer recommendation from 2020 is unchanged. While the site was within catchment of a Council-led SANG solution, the Council's SANG allocation policy (CSN01.1) requires green belt sites to identify their own solution as existing Council-led SANG capacity is limited. The site promoters did not have a bespoke SANG solution at the time. The Council's approach here was in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is not proposed as an allocation.
2024 Justification	Officer recommendation from 2023 is unchanged. Development of the site is likely to impact upon the adjacent listed building. The site also carries a higher degree of flood risk and green belt constraints and is not of a scale which can deliver compensatory improvements or infrastructure benefits to offset the impacts. Whilst the wider parcel was assessed as having a moderate contribution, the Green Belt Stage 2 recommended land west of Lower Road is retained as Green Belt due to its role in preventing ribbon development and preventing coalescence. The site forms part of a visual open gap separating the edge of Hemel Hempstead from Nash Mills and Kings Langley. Sequentially, officers consider that there are more appropriate sites outside of the built-up area of the six main settlements that can deliver the strategy and therefore is not recommended as an allocation.



## Hemel117R | Shendish Manor and Fairfields

Description:	Land partly in use as a golf course and partly grassland, bounded by the Shendish Manor hotel to the west, the Manor Estate residential development to the north, the railway to the south and by Rucklers Lane to the east.
Capacity of site	HELAA: 841 Site promoter: 500 dwellings or 439 homes together with a care village of 160 (assumed C2) units
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including provision for older people and self/custom build. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing.	
Social Infrastructure	The site is of a scale that could deliver additional community facilities for Hemel Hempstead, including a new local centre and primary school. Delivery of a primary school on this site would resolve objections raised by the education authority with regards to brownfield regeneration proposals at the Two Waters Opportunity Area.	
Green Infrastructure	Provision to be made for a bespoke SANG on site. Provision of green infrastructure typologies and sports provision required on-site. Community use of sports provision at education facilities should be secured.  Development on the site would affect the existing 18-hole golf course. Golf facilities on the site are proposed to be retained and reconfigured to 9 holes with the addition of new practice facilities such as pitch and putt, driving range and simulators. This would contribute to a need for entry level golf facilities identified within the Borough within the DBC Playing Pitch Strategy Assessment Report (2019) on the advice of Golf England.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the northern part of the site is considered to have high landscape sensitivity, and the southeast parcel is considered to have moderate sensitivity. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (D-S3) which is considered to contribute weakly to the purposes of the Green Belt. The study considered that a refined area of the parcel, which broadly corresponds to the area of this site, would not compromise the ability of the wider Green Belt to meet its purposes.	
Flooding	Site is wholly within Flood Zone 1. A small area in the western corner of the site is at a higher risk of surface water flooding. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	1.9% of the site is Ancient Woodland and 7.6% of the site is priority habitat deciduous woodland. The site contains 1 tree preservation order.	

	It is considered that the site is large enough that the retention of these assets would not constrain development.	
Historic Environment	<p>There are three Grade II listed buildings located within 100m of the site. Part of the southwestern portion of the site is situated within an area of archaeological significance.</p> <p>Part of the Shendish Manor (not included within the allocation boundary) is a locally registered park and garden,</p>	
Highways Impact	<p>Development is likely to have an impact on the local road network at peak periods, predominantly on the A4251 between the development and Kings Langley and along Two Waters Way/Road to Hemel Hempstead.</p> <p>Traffic Modelling has indicated that the development would not have a significant impact on Junction 20 with the M25 and that the impact on the local road network is lower than other developments (TRA04.1).</p>	
Sustainable Transport	The site is located within the immediate vicinity of Apsley Train station and is located closely to bus stops on London Road which are served by the 500 to Watford and Aylesbury. According to recent representations, the site promoter has confirmed the site would enable to deliver a 1.8m wide footpath across the railway.	
Access	<p>The site has an existing access onto the A4251 (providing access to Shendish Manor hotel and golf course), and secondary access can be provided onto Rucklers Lane. These are unlikely to be sufficient to accommodate the quantum of development.</p> <p>Within their representation to the Revised Strategy for Growth, the site promoter confirmed they had agreed an alternative access onto the site via the Manor Estate extension at Shearwater Road, as there is a right to connect the two sites as set out in the Manor Estate S106 Agreement.</p>	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the boundary of this site through their May 2024 representations to the Infrastructure Delivery Plan (IDV01.1).</p> <p>Wastewater: Thames Water have confirmed through their May 2024 Representations to the Infrastructure Delivery Plan (IDV01.1) that based on the information available, the scale of development is likely to require upgrades to the wastewater network.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is within 800 metres of the Lawn Lane AQMA and the London Road Apsley AQMA. The site contains an area of former land use risk zone associated with engineering works (c. 1.9 ha). 69% of the site is located within Source Protection Zone 3.	

Minerals and Waste Considerations	The site is located within the Brick Clay Mineral Safeguarding Area however the area adjacent to the railway line is unlikely to be suitable for extraction in any circumstances due to safety constraints, and it is considered that extraction on the other parts of the site could compromise the areas of woodland and tree planting expected to be retained by development.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing, which was confirmed by site specific viability testing within the Regulation 19 Viability Note (Sep 2024, IDV03.3).	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 36)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	-	✓	✓ x	x	?	?	x	?	✓	✓	✓	✓✓	?
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
Included as a variable allocation within the scenario testing (justification set out on page 25, paragraphs 5.4.20-5.4.22). Tested as part of scenario 6, 7, 8, 9, 10, 11 and 12. Within section 7 of the document officers selected scenario 4 as the preferred option (7.1.1) and specifically noted that “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” and referenced transport concerns in relation to Shendish Manor.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
Included in scenario testing and progressed as a constant. The justification for this is set out in paragraph 5.4.15 and 5.4.16, noting that the site is sensitive, but is also “lower sensitivity Green Belt (Figure 5.4), performs very well in transport terms (Apsley station plus the adjacent A4251) and can deliver a bespoke SANG. Access is also challenging, but there is now sufficient confidence that adequate access can be achieved (accounting for both car and non-car travel)”. This site formed part of the Council’s preferred scenario 7 (7.1.1).														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B55)	Site is not proposed as an allocation.
2020 Justification (PCD05.3, pg. B55-B56)	Site performs well on a number of identified criteria, with the majority of identified constraints likely to be sufficiently mitigated alongside development, and the site’s close proximity to Apsley station is seen as a significant positive. Officers remain concerned about how safe site access can be provided over the railway line or onto the Rucklers Lane. While a technical solution may be achievable for this, the impact that development of this site may have on the local and strategic road network could be significant,

	particularly with respect to the Air Quality Management Areas to the north of the site and Junction 20 of the M25 to the south. The delivery of new on-site infrastructure such as a school could exacerbate these concerns. A smaller scale of development may address a number of these issues, however officers consider that, on balance, there are more suitable sites in the area which can better deliver the strategy of the Local Plan.
--	--

2023 Recommendation	Site is not proposed as an allocation.
2023 Justification	Officer recommendation from 2020 is unchanged and concerns remain with regards to the provision of safe access to the site. Furthermore, while the site was within catchment of a Council-led SANG solution, the Council's SANG allocation policy (CSN01.1) requires green belt sites to identify their own solution as existing Council-led SANG capacity is limited. The site promoter did not have a bespoke SANG solution at the time. The Council's approach here was in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is proposed as an allocation for around 500 homes.
2024 Justification	<p>Following the site promoter's regulation 18 representations in 2023, officers now have sufficient confidence that there is a solution with regards to the provision of vehicular access to this site. Following further traffic modelling and engagement with National Highways, there is additional confidence that the development would not have a significant impact on Junction 20 with the M25.</p> <p>Whilst this site is sensitive in landscape and heritage terms, it is considered these constraints can be mitigated through design. The site has no significant flood risk, ecological or infrastructure capacity constraints.</p> <p>The site is in a sustainable location, adjacent to a mainline train station and it can deliver a primary school that will also enable residential-led redevelopment of brownfield sites across the Two Waters Opportunity Area. The site is also able to deliver a bespoke SANG on-site, reconfigured golf facilities and a neighbourhood centre to include space for health provision.</p> <p>Having regard to the alternative site options, Hemel117R is the only site in Hemel Hempstead located within Green Belt that makes a weak contribution to the purposes, which has sufficient potential to deliver the Spatial Strategy and form part of reasonable alternative growth scenarios within CD03.1. Furthermore, the refined assessment parcel the site is in would not compromise the ability of the wider Green Belt to meet its purposes.</p>

**Pre-Submission considerations:**

**Wastewater:** the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required, and it is likely that upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

## Hemel126R | Shaffold Knoll Farm

Description:	The site is an area of green space, bounded by Lower Road to the northeast, and the Grand Union Canal to the southwest, with commercial use to the south and a scaffolding company to the north.
Capacity of site	HELAA: 46 Site promoter: 33 dwellings and (up to) a 70-bed care home
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is promoted to deliver a combination of dwellings and a C2 care home.	
Social Infrastructure	The site is not of a scale that is expected to deliver social infrastructure on site.	
Green Infrastructure	The development is within the catchment of SANGs serving the settlement. Development would be expected to meet its open space needs on-site and contribute towards offsite sport and leisure provision.	
Landscape	The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape. The parcel was not assessed in CSN10.1.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (HH-A12) which is considered to contribute moderately to the purposes of the Green Belt. This site is much smaller than the parcel. The study recommended that parcel HH-A12 is modified to exclude the land west of Lower Road (including this site) due to its importance in preventing coalescence between Hemel Hempstead and Kings Langley and ribbon development along Lower Road.	
Flooding	3% of the site is within in Flood Zone 2 and 0.29% in Flood Zone 3. 65% of the site has a low risk of surface water flooding, with 14% at a medium risk. This site has a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots.	
Environmental	The Grand Union Canal/River Gade wildlife site is adjacent to the site and runs along the southwestern boundary.	
Historic Environment	The site is adjacent to the Abbotts Hill locally registered park to the east.	
Highways Impact	Development of this site would likely result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network, when compared to alternatives.	
Sustainable Transport	Following existing footways the site is currently over 400m from the nearest bus stops on Red Lion Lane (currently served by the 501 bus service to Watford and Aylesbury), however there is the potential to provide a connection from the site to the canal towpath which would reduce this by around half. Site is also in reasonable distance (15 min walk) to Apsley train station although this is less well connected to local facilities in comparison to alternatives. Development of the site could contribute towards public transport enhancements in the area.	
Access	Existing access is available from Lower Road.	

Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Local upgrades may be required to ensure sufficient capacity is available ahead of development.</p>	
Other Utilities	<p>The site contains no major gas or oil pipelines. A power pole with minor power lines is located at the eastern border.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	The site is located within 50m of the former land use risk zone associated with the former refuse disposal. 100% of the site is located within Source Protection Zone 3.	
Minerals and Waste Considerations	The site is located within the Sand & Gravel Mineral Safeguarding Area.	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location are viable and able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1)
This site was not tested in the 2020 sustainability appraisal, as officers considered that this site was not suitable to be carried forward for further detailed testing in PCD05.2 Appendix A.
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)
This site was not considered within the Interim SA report, as it had not been recommended for detailed testing within PCD05.2 Appendix A.
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)
Included in scenario testing and progressed as a variable in scenario 1, 2, 3 and 10. The justification for this is set out in paragraph 5.4.20, although this notes Green Belt constraints, surface water flooding and adjacent local wildlife site, and the lack of a SANG solution. This site did not form part of the Council's preferred scenario 7 (7.1.1).

### Summary of Officer Recommendations

2020 Recommendation (PCD05.2, A5-A6)	Site is not proposed as an allocation
2020 Justification (PCD05.2, A5-A6)	AECOM considered that this site was sites considered to be suitable for further consideration, however officers did not carry this forward for detailed testing as development of this site would erode the important open gap separating Hemel Hempstead from Nash Mills, resulting in coalescence between the settlements.

2023 Recommendation	Site is not proposed as an allocation
2023 Justification	Officer recommendation from 2020 is unchanged. While the site was within catchment of a Council-led SANG solution, the Council's SANG allocation policy (CSN01.1) requires green belt sites to identify their own solution as existing Council-led SANG capacity is limited. The site promoters did not have

	a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).
--	---

2024 Recommendation	Site is not proposed as an allocation
2024 Justification	Officer recommendation from 2023 is unchanged. The site has Green Belt constraints. Whilst the wider parcel was assessed as having a moderate contribution, the Green Belt Stage 2 recommended land west of Lower Road is retained as Green Belt due to its role in preventing ribbon development and preventing coalescence. The site forms part of a visual open gap separating the edge of Hemel Hempstead from Nash Mills and Kings Langley. The site is also affected by flood risk and is adjacent to a wildlife site. Sequentially, officers consider that there are more appropriate sites outside of the built-up area of the six main settlements that can deliver the strategy and therefore is not recommended as an allocation.

**Post submission considerations:** Planning application 24/01424/MOA was refused on Wednesday 9<sup>th</sup> July 2025, with 4 reasons for refusal: Green Belt, design, the absence of a legal agreement and the lack of mitigation to address adverse impacts on the Chilterns Beechwoods SAC. An appeal was lodged on 24<sup>th</sup> October 2025 (APP/A1910/W/25/3373146). This is to be decided and is being considered via written representations.



## Hemel136R | North and North-East of Hemel

Description:	A large area of predominantly agricultural land located northeast of the town, bounded by the Leighton Buzzard Road to the west, the built-up area of Hemel Hempstead to the south, and agricultural land to the north and east. The land to the east is located within St Albans District and is proposed to be allocated for residential led mixed use development, supporting the wider 'Hemel Garden Communities' programme (reference H1) within their emerging Local Plan.
Capacity of site	HELAA: 6120 Site promoter: 5000
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including provision for older people and self/custom build. This site would be able to provide accommodation for Gypsies and Travellers. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing. Development of homes at this scale would provide several distinct new neighbourhoods.	
Social Infrastructure	Site of this scale has significant potential to deliver large scale community services ranging from multiple local/neighbourhood centres that incorporate primary and secondary schools, to sports and leisure facilities. A large green buffer of open space is expected to be preserved and enhanced along the northern boundary of the site, as well as the provision of significant new open space. Development of this scale is likely to provide additional services such as health facilities, community buildings and retail units to serve existing and future communities.	
Green Infrastructure	Provision to be made for a bespoke SANG on site. This site would meet its open space needs in full and include outdoor sports provision to meet its own needs and make a significant contribution towards deficiencies within the settlement. Community access to education facilities should be secured.	
Landscape	<p>In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have high landscape sensitivity, but the southwest portion is moderate or moderate-high due to the distance from the National Landscape.</p> <p>The HELAA 2024 (SSA01.4) identified that the site is adjacent to the Chilterns National Landscape, and development is likely to impact its setting.</p> <p>This site was considered in a further landscape appraisal (HGC07.1) (which examined the character areas at a local scale to define new sub areas). This identified that the majority of this site has a medium sensitivity, with one area 'high-medium' as it is currently not connected to the built-up area of Hemel Hempstead, where development would require mitigation. The study also identified that the Gade Eastern Slopes have a high sensitivity where significant development would not be suitable. Further capacity studies have confirmed that the site can</p>	



	accommodate c. 5000 homes within the boundary recommended by the study.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (HH-A1) which is considered to contribute strongly to the purposes of the Green Belt, as well as a small portion in parcel HH-A2 in the southwest, which contributes moderately to the purposes of the Green Belt.	
Flooding	Site is wholly within Flood Zone 1. Areas of higher surface water flood risk are in three flow paths in the centre of the site. Flooding from groundwater is not likely in most of the site. At the border with Woodhall Farm ward and the foot of the Gade Valley, the site has a risk of groundwater flooding to subsurface assets.	
Environmental	According to the 2024 HELAA Update (SSA01.1), 1.7% of the site is Ancient Woodland. 2.6% of the site area is made up of priority habitat deciduous woodland and traditional orchard. The site contains the Varney's Wood and Hay Wood (Holtsmere) wildlife sites. It is considered that the site is large enough that the retention of these assets would not constrain development. The site is also within 400 metres of Howe Grove Wood Nature Reserve.	
Historic Environment	There are five Grade II listed buildings within the site and seven within 100m of the site. The site is within 100m of the Piccotts End conservation area. The site is adjacent to an area of archaeological significance largely covering Piccotts End. Any development will need to minimise harm to the setting and significance of the listed buildings and Piccotts End conservation area.	
Highways Impact	Development of this site would likely result in a significant increase in traffic to and from the site at peak hours, when compared to alternatives. Although the scale of the site would likely result in the provision of significant infrastructure on site, both in terms of new roads (potentially including a new strategic link road) which could alleviate pressures on the existing network, new public transport corridors, new sustainable transport link such as dedicated cycleways and footpaths, and new local centres (including schools) which would likely contain many of the trips to within the boundaries of the site.	
Sustainable Transport	Site is within reasonable distance to the local bus services at Grovehill and Highfield but is more distant from the local bus services in Gadebridge. Development of this site will deliver significant enhancements to the public transport network for Hemel Hempstead, including the delivery of dedicated new bus routes along the Sustainable Transport Corridor. It is also expected to deliver significant modal share across the whole of the site.	
Access	Site of this scale has multiple access opportunities onto the local road network. Key road access is likely to be provided from Leighton Buzzard Road and would require significant enhancements in the vicinity of the junction. Secondary access for initial phases along the western part of the site will be provided via Marchmont Farm. Primary access to the east of the site is expected to be delivered via allocations in the St Albans Local Plan north of the Redbourn Road.	

	Development of this site would also require a significant amount of new transport infrastructure including new roads, cycle and pedestrian facilities and greater public transport provisions.	
Water and Wastewater	<p>Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the boundary of this site.</p> <p>Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater treatment infrastructure capability in relation to this site (2,500 homes), although they noted that the development will likely require upgrades to the wastewater network. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1 (1,500 homes).</p> <p>In 2020 Thames Water confirmed that upgrades to both the wastewater network and sewage treatment infrastructure would be required to accommodate the full development of the site up to 2050 (CD10.4 ESG12632).</p>	
Other Utilities	Major power lines/pylons traverse the eastern edge of the site; however these are unlikely to impact the development potential of the site in this location. Reinforcement works are required to accommodate growth on the site, although significant new gas pipe laying is not likely to be required. Separate connections may be required for the east and west of the site.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is located within 50m of the former land use risk zone associated with the historic landfill at Grovehill Playing Fields and former fireworks manufacture. 4% of the site is located within Source Protection Zone 1, 30% in Source protection zone 2 and 66% in Source protection zone 3. Affinity Water raised potential concerns with regards to the impact of development on water quality (IDV01.1 Section 8.1) due to the large area which extends into source protection zone 1. The Council considers that this site can be viably delivered with no built development in this area.	
Minerals and Waste Considerations	Site is not located in a Mineral Safeguarding Area.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing, which was confirmed by site-specific viability testing in 2024 through the Regulation 19 Viability Note (Sep 2024, IDV03.3).	

SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment			
x	✓	?	-	✓	x	?	x	-	x	x	✓	✓	x	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)																	
This site was included in scenario testing as a variable (as justified within paragraphs 5.4.17 to 5.4.19). The only scenario which didn’t test this site was scenario 1, which performed poorly when assessed against the SA framework (table 6.2, page 69) and it was selected as part of the preferred scenario 4 (7.1.1).																	
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)																	
Included in scenario testing and progressed as a constant. The justification for this is set out in paragraph 5.4.12 to 5.4.14, noting that “1,500 homes is considered a suitably conservative figure, accounting for landownership and phasing / market outlet considerations, and recognising challenges/risks around delivering infrastructure including roads”. This site formed part of the Council’s preferred scenario 7 (7.1.1).																	

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B47)	Site is proposed for an allocation of approximately 5,500 dwellings alongside significant new open space (including the potential for a country park of borough-wide significance). It should deliver new communities and neighbourhoods. Up to 1,500 dwellings are expected to be delivered within the plan period up to 2036, with the remaining land safeguarded for future development beyond the plan period. Development of the site as a whole is predicted to be completed by 2050.
2020 Justification (PCD05.3, pg. B47)	<p>The site is the largest considered through the selection process for the Local Plan and with that, it performs relatively poorly in relation to a number of constraints such as Green Belt, landscape sensitivity and highways impacts. Development of the site would likely result in significant pressures on existing infrastructure, however this is considered against the merits of the site delivering significant new infrastructure, such as new roads, dedicated sustainable transport corridors, community hubs/local centres, schools, health and other facilities alongside new public open space, new green infrastructure and substantial landscape mitigation measures.</p> <p>Officers agree with the AECOM Site Assessment Study recommendation that the western part of the site is unsuitable for development due to heritage, landscape and visual and coalescence impacts on Piccotts End and the undeveloped Gade Valley. Officers are confident that any adverse impacts can be sufficiently mitigated to ensure no significant effects occur, including in relation to the setting of the Chilterns AONB and the many heritage assets located in the Gade Valley. Officers have considered the merits of this site against other reasonable alternatives and conclude that it represents the most sustainable solution to long term growth for Hemel Hempstead, having regard to the prevailing nature of development expected to come forward on land to the east of Hemel Hempstead (in St. Albans City and District). For this reason,</p>

	the site is recommended as two separate allocations in the new Local Plan, with one of these safeguarded for longer term development beyond the plan period.
2023 Recommendation (PCD01.1, page 6)	Site is proposed for an allocation of 2500 homes between 2024-2040 and is expected to deliver an additional 3000 homes post 2040.
2023 Justification	The site was recommended as a draft allocation broadly in line with officer recommendations in 2020. The site was supported by an onsite SANG solution. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed for an allocation of 1500 homes between 2026-2041 and is expected to deliver an additional 3500 homes post 2041.
2024 Justification	<p>Officers continue to recognise the presence of constraints of the site, and a significant amount of evidence has been progressed to ensure proposals respond to these appropriately. It is also considered that the sites constraints can be sufficiently mitigated without preventing the site from being developed, due to its scale. The revised site boundary proposed within HGC07.1, responding to landscape and environmental constraints has reduced the overall site capacity, the site is still capable of delivering around 5,000 new homes plus supporting infrastructure up to 2050.</p> <p>Development of this scale would provide distinct new neighbourhoods with significant new provision of community services and facilities, including multiple neighbourhood centres, primary and secondary schools, health, sports and leisure facilities, community buildings and retail provision. Officers have decided to reduce the level of growth proposed within the period of the local plan to 1,500 homes to reflect likely delivery rates associated with a scheme of this scale.</p> <p>Whilst the wider Green Belt assessment parcel (HH-A1) is judged to make a strong contribution to the purposes of the Green Belt overall, specifically purpose C (with a moderate contribution to A and B), officers consider the site is able to deliver significant compensatory improvements to the parts of the site remaining within the Green Belt, in accordance with the recommendations of the Landscape Study (HGC07.1). This study also notes the opportunity to provide a boundary that is readily recognisable and likely to be permanent, which uses existing features.</p> <p>The development of this site would support the wider Hemel Garden Communities programme in partnership with St Albans Council, which aims to deliver up to 11,000 homes across both council areas. HGC has broader ambitions with regards to high quality placemaking, delivering modal shift away from the private car, and establishing a strategy for community stewardship. HGC will also deliver an extension to the Maylands Employment Area (the Hertfordshire Innovation Quarter).</p>

	<p>The Hemel Garden Communities programme represents a scale of development sufficient to enable the delivery of transformational benefits to the existing services and infrastructure of Hemel Hempstead, particularly with regards to upgraded active and sustainable travel provision and investment in existing local centres.</p> <p>Having regard to alternative sites, whilst officers recognise the contribution this site currently has to the Green Belt, that these harms are outweighed by the sustainability benefits associated with this proposal.</p>
--	---

**Pre-Submission considerations:**

Wastewater: the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required, and it is anticipated that upgrades to the wastewater network will be necessary. Thames Water also noted that they are aware of capacity concerns at the Maple Lodge Sewage Treatment Works and a scheme is planned to accommodate future growth. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

## Berk019R | South of Berkhamsted and Land between Hanburys and A41

Description:	Two parcels of land, all located to the south of the existing built-up area of Berkhamsted. The larger parcel of land is bounded by the A41 to the south, agricultural land to the east (site “East of Berkhamsted”) and the built-up area of Berkhamsted to the north, including existing primary and secondary school education. The smaller site is bounded by the existing Local Allocation 4 to the north, the A41 to the south, playing fields (site “Haslam Playing Fields”) to the west and the BFI archives to the east.
Capacity of site	HELAA: 961 Site promoter: 750
HELAA conclusion	Deliverable: The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, provision for older people and other forms of specialist housing such as self/custom build. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing at 40% (c.300 dwellings using the promoted capacity). The site will also deliver some local employment opportunities within the local centre, primary school and housing with care.	
Social Infrastructure	<p>The site is of a scale that could deliver additional community facilities for Berkhamsted, including a new community hub, medical centre and primary school.</p> <p>Officers are aware the ability of the existing state secondary school in Berkhamsted is limited before it reaches maximum capacity (subject to a feasibility study undertaken by HCC). This is due to the size of the school, limited land availability on the school grounds and the grade II listed status of the main school building. The level of development proposed is not of a scale which would exceed capacity at Ashlyns beyond this expansion.</p> <p>Although the site is of a sufficient size to provide a secondary school this would not be feasible as it would significantly reduce the site’s ability to deliver other infrastructure and housing. The site is located adjacent to the existing secondary school and could potentially enable an expansion scheme, subject to detailed consideration.</p>	
Green Infrastructure	This site would meet its open space needs in full and include outdoor sports provision to meet its own needs and make a significant contribution towards deficiencies within the settlement. Community access to facilities provided at the primary school should be secured. SANG provision is available for Taylor Wimpey developments at Haresfoot Farm (granted permission for change of use to SANG 23/09/24).	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have high-moderate sensitivity, in part due to contributions to the setting of Ashlyns Hall Grade II* listed building. The small western segment (Land between Hanburys and A41) has moderate	

	sensitivity although this is no longer promoted for residential development. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape as a result of proximity, however the landscape sensitivity study noted the topography and elevation of the parcel creates long distance views across the valley.	
Green Belt Evaluation	The Stage 2 Green Belt Study identifies the two sites form part of larger parcels (Parcels D-S2a and D-S2b). Parcel D-S2a performs weakly against the overall purposes, and Parcel D-S2b performs the weakest. The larger site broadly corresponds with Parcel D-S2b so its contribution to the purposes of the Green Belt is unchanged. The site to the west is much smaller than the parcel assessed and therefore it could be concluded that its contribution to the purposes of the Green Belt would be less than that stated in the study.	
Flooding	Site is within Flood Zone 1. Most of the site is at a very low risk of surface water flooding, with only two small flow paths in the centre of the site at a higher risk. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	According to the 2024 HELAA Update (SSA01.1), the site contains TPOs and an area of priority habitat deciduous woodland, which is also designated as the Long Green wildlife site (c. 7.45% of the site area) however it is considered that the site is large enough that the retention of these assets would not constrain development.	
Historic Environment	Two listed buildings are located within 100m of the site (grade II* Ashlyns Hall and the Stables at Ashlyns Hall). Any development would need to conserve and if possible, enhance their setting.	
Highways Impact	Development is likely to have an impact on the local road network at peak periods, including on Chesham Road, the A416, Swing Gate Lane and London Road. Offsite transport enhancements would likely be required along the A4251/London Road, Shootersway, Chesham Road, Swing Gate Lane and the A416 (Kingshill way).	
Sustainable Transport	Site is in reasonable distance to frequent bus services of 500 and 501 to both Aylesbury and Watford. Site is also within a 5-minute walk to more local, but less frequent services for Berkhamsted. Berkhamsted train station is a 25–35-minute walk and 10–15-minute cycle, although topography is recognised as a constraint. The site is of a scale that could provide new/enhanced public transport connections with the town.	
Access	Access to the larger parcel of the site can be provided from Chesham Road and Swing Gate Lane, although following discussions with the Highways Authority it is likely the latter will only be appropriate for bus, cycle, pedestrian, and emergency access. There is a potential pedestrian access point from Fieldway onto Upper Hall Park. The smaller parcel currently has no access from the existing road network and would be reliant on gaining access through one of the neighbouring sites (Haslam Field or British Film institute)	
Water and Wastewater	Water: (CD10.5, Comment ID RSG_1090) There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required. Affinity Water also noted there are water mains apparatus within the boundary of this site.	



	Wastewater (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), both parcels are adjacent to the A41 which could give rise to air and noise pollution. The site is underlain by a Principal Aquifer, with 54% of the site is located within source protection zone 2, and 46% in zone 3. The smaller parcel is located adjacent to the Kingshill Cemetery which is a potential source of ground contamination for the site, however as this is no longer proposed for residential this is unlikely to be an issue.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	This site has been assessed to be viable against the proposed policy requirements of the emerging Local Plan. The site is also subject to a live outline planning application and already benefits from an established SANG which is wholly within the control of the site promoter.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 38)															
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment	
X	✓	?	-	X	✓	?	X	?	X	X	X	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)															
The larger parcel of the site was progressed as a variable within scenario testing for the reasons set out in 5.4.36. The site formed part of scenarios 1, 4, 5, 8, 9, 10 and 12. The council's preferred scenario was scenario 4 (7.1.1). The smaller parcel was tested as part of the 'Kingshill Way cluster' (also including Berk020R and Berk025R) which did not form part of the preferred scenario.															
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)															
Included in scenario testing and progressed as a constant. The justification for this is set out in paragraph 5.4.27, noting that this is the one HELAA (SSA01.1) 'deliverable' site. This site formed part of the Council's preferred scenario 7 (7.1.1). The smaller parcel of land was not included within this figure as it was suggested by the site promoter that this could deliver biodiversity improvements to offset the development of the larger parcel (5.4.29).															

## Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B5-6)	Two sites are proposed for an allocation of around 850 and 70 dwellings respectively, with public open space. The larger site should also deliver additional services and facilities in the form of a new primary school and a new community hub.
2020 Justification (PCD05.3, pg. B5-6)	Both sites perform reasonably well with respect to identified constraints, which are likely to be addressed through appropriate mitigation. Given their limited contribution to Green Belt purposes, limited landscape impact and spatial relationship with the existing settlement of Berkhamsted, officers consider that the capacity/densities of these sites should be optimised. This is on the basis that the larger site can deliver additional new services and facilities to serve existing and new communities in Berkhamsted, including a new community hub and primary school as a minimum.

2023 Recommendation (PCD01.1, page 12)	Site is proposed as an allocation for around 850 dwellings
2023 Justification	The site was recommended as a draft allocation broadly in line with officer recommendations in 2020. The site was supported by a bespoke third party SANG solution at Haresfoot Farm. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is proposed as an allocation for around 775 dwellings
2024 Justification	The allocation of this site is justified by its potential to deliver a comprehensive urban extension in Berkhamsted with a new primary school, health facility, and neighbourhood centre. The site makes a weak contribution to the purposes of the Green Belt and other constraints identified are likely to be mitigated.

## Pre-Submission considerations:

**Wastewater:** the Regulation 20 representation from Thames Water provided an updated position which stated that modelling will be required following the grant of outline planning permission, and it is anticipated that upgrades to the wastewater network will be necessary and required by condition prior to commencement. No concerns were raised with regards to the capacity of the Berkhamsted Sewage Treatment Works. Officers note that it has been confirmed through the outline planning application that there is sufficient capacity within the existing wastewater network to accommodate the first phases of development on this site (c.40% of the overall dwellings proposed). Pre-commencement modelling to determine the scale of upgrades required to accommodate the remaining phases of development (as required by condition) can take place concurrently with the delivery of this phase following the grant of reserved matters. Therefore, officers still consider this to be a deliverable site.

Description	An area of previously developed land currently in use by the British Film Institute for the preservation/conservation of the national film archives. It is bounded to the west by the existing Local Allocation 5, to the east by the cemetery, to the south by agricultural land and A41, and to the north by the A416 and the existing built-up area of Berkhamsted.
Capacity of site	HELAA: 79 Site promoter: 100
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	<p>The site is of a scale which would be able to deliver a range of house types, although it is unclear if the site would be of a scale to deliver specialist housing (such as custom/self-build or provision for older people).</p> <p>The site currently employs approximately 100 people in predominantly specialist jobs. The previous position was that all the BFI facilities would be relocated, however through site promoter meetings in 2024, the BFI have confirmed that their first preference for the redevelopment of its site would involve the relocation of the archive storage facilities to a new purpose-built facility off-site (releasing most of the land for residential development), and to use income generated from the residential development to re-invest in the Conservation Centre on-site.</p> <p>The BFI have confirmed ambitions to deliver a replacement Conservation Centre on-site which would become a first of its kind research and training hub for heritage science, film conservation and preservation. It is likely any jobs would be retained either within the new archive facility, or as part of the new conservation centre.</p>	
Social Infrastructure	Site is of a scale that is unlikely to deliver new social infrastructure on-site. Officers are aware the existing state secondary school in Berkhamsted has limited expansion potential before it will be at maximum capacity. The level of development proposed is not of a scale which would exceed this. The site is not of a scale which could deliver a secondary school on site.	
Green Infrastructure	The site is within the catchment of an established SANG (Westbrook Hay) and will also be within the catchment of the Hill Farm Gateway site (expected to be delivered later in the local plan period). Development would be expected to meet its needs for other forms of open space on-site and contribute towards offsite sport and leisure provision.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have a low-moderate landscape sensitivity. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (Parcels D-S2a) which is considered to make the least contribution to the purposes of the Green Belt. The site is much smaller	

	<p>than the parcel assessed and therefore it could be concluded that its contribution to the purposes of the Green Belt would be less than that stated in the study. The Stage 3 Green Belt Study (2020) stated that the southeastern boundary did not have a physical feature and as such was very weak. It is noted that the site boundary was revised following a request from the site promoter in 2023, and as such the southeastern side now follows a line of significantly dense mature trees and hedgerows which officers consider is readily recognisable and likely to be permanent.</p>	
Flooding	<p>Site is wholly within Flood Zone 1. A small area of the site on the northwestern boundary is at a higher risk of surface water flooding. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.</p>	
Environmental	<p>The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation. There are no other identified environmental or ecological constraints associated with this site.</p>	
Historic Environment	<p>There are two grade 2 listed buildings located on either side of the current site access ('Ernest Lindgren House' and 'Granary at Ernest Lindgreen House'). Any development would need to conserve and enhance their setting. The southeastern corner of the site is in an area of archaeological significance.</p>	
Highways Impact	<p>Development of this site would likely result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network. The BFI have also confirmed that the new Conservation Facility would not be an open visitor facility.</p> <p>If larger scale growth is proposed in the southwest of Berkhamsted, it is likely that this would give rise to further traffic issues along Shootersway, particularly at the junction with the A416/Kings Road and the A41 junction.</p>	
Sustainable Transport	<p>Site is a 15–20-minute walk from the frequent 500, 501, X500 service between Watford and Aylesbury and is a 5–10-minute walk to the less frequent 354 service from Northchurch to Chesham (via the railway station). Site is a 20–25-minute walk or a 5–10-minute cycle from the mainline Berkhamsted train station although topography is recognised as a constraint. Development of this site in isolation would unlikely result in significant enhancements to the pedestrian or public transport network in Berkhamsted.</p>	
Access	<p>Site has existing access onto Kingshill Way, although it is constrained by the listed buildings in this location. Alternative access could be provided closer to the northeastern corner onto Kingshill Way.</p>	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Thames Water have confirmed through their May 2024 Representations to the Infrastructure Delivery Plan (IDV01.1) that they do not envisage infrastructure concerns regarding the capacity or capability</p>	

	of the wastewater network or wastewater treatment infrastructure in relation to this site.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is in the vicinity of the A41 which could give rise to air and noise pollution, although this is less of an issue when compared to other sites in the area which are adjacent to the road. The site is located within 50m of the former land use risk zone associated with the cemetery. Site is underlain by a Principal Aquifer and is located within Source Protection Zone 3.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 38)																
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment		
-	?	?	x	x	✓	?	?	?	x	✓	x	✓	✓	x	✓	?
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)																
Included as a variable allocation within the scenario testing as part of a wider ‘Kingshill Way Cluster’ made up of three sites, including the smaller parcel of Berk019R and Berk025R (justification set out on page 27, paragraphs 5.4.37). Tested as part of scenario 2, 3, 6, 7, 10, 11, and 12. Within section 7 of the document officers selected scenario 4 as the preferred option (7.1.1) and specifically noted that “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” and that “The Council is equally unable to identify a Council-led Strategic SANG at key locations such as Berkhamsted”.																
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)																
Included in scenario testing and progressed as a constant. The justification for this is set out in paragraph 5.4.28, noting that there is confidence a SANG solution can be delivered and that this site is PDL. This site formed part of the Council’s preferred scenario 7 (7.1.1).																

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B8)	Site is proposed for an allocation of around 100 dwellings, with public open space.
2020 Justification (PCD05.3, pg. B9)	Site performs reasonably well with respect to identified constraints, which are likely to be addressed through appropriate mitigation. Given the brownfield

	nature of the site, its limited contribution to Green Belt purposes, its limited landscape impact and spatial relationship with the existing settlement of Berkhamsted, officers consider that the capacity/densities of this site should be optimised. The site is not expected to be delivered in the first five years of the plan and officers are confident that there is a reasonable prospect that the site will become available for development in the middle of the plan period.
--	---

2023 Recommendation (PCD01.1, page 12)	Deleted as an allocation
2023 Justification	The site was deleted as a draft allocation on the basis that it was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5) and paragraphs 5.5.13-5.5.17 of the HRA in 2023 (CD04.2).

2024 Recommendation	Site is proposed for an allocation of around 100 dwellings, and a new conservation centre
2024 Justification	<p>Officers continue to support the allocation of Berk019R, which, considering secondary school capacity constraints within the settlement and the significant constraints associated with the only site of a sufficient size to deliver a new secondary school (Berk031R), limits the number of further sites which could be considered before the proposed capacity at Ashlyns would be exceeded.</p> <p>This site is considered to perform sequentially better than alternative sites promoted in the settlement, particularly with regards to the site being previously developed, located within Green Belt which makes the weakest contribution to the purposes and lower landscape sensitivity. Development in this location will also be closely located to new facilities being delivered on site Berk019R, promoting sustainable patterns of development. It is within the catchment of the two SANG solutions (Westbrook Hay SANG and Hill Farm Gateway). As the site is not expected to deliver until later in the plan period, it is expected to contribute towards the Hill Farm Gateway SANG.</p> <p>The site is also seeking to re-invest in the BFI conservation centre on site by providing a new purpose-built facility that would support training and skills development, whilst retaining the BFI's presence in the town.</p> <p>The BFI is required to follow a staged business case process, and no development could take place until a facility is provided to relocate the archive material to. Therefore, the site is proposed to deliver within the later parts of the plan period.</p>

#### **Pre-Submission considerations:**

**Wastewater:** the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling may be required to determine if upgrades to the wastewater network will be necessary. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.



## Berk021R | Blegberry Gardens

Description	Site principally consists of agricultural land and is bounded by agricultural land and the A41 to the south and west, and the built-up area of Berkhamsted to the north and east.
Capacity of site	HELAA: 87 Site promoter: 80
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including self/custom build.	
Social Infrastructure	Site is of a scale that is unlikely to deliver new social infrastructure on-site. Officers are aware the existing state secondary school in Berkhamsted has limited expansion potential before it will be at maximum capacity. The level of development proposed is not of a scale which would exceed this. The site is not of a scale which could deliver a secondary school on site.	
Green Infrastructure	This site is not located within the catchment of an established SANG, however it is within the potential catchment of a SANG solution which is expected to be delivered later in the plan period (Hill Farm gateway, or People's Park). The site is beyond catchment of existing open space provision and would need to meet its needs for open space on site in full (HC5 Reg 19 plan) and contribute towards offsite sport and leisure provision.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have moderate landscape sensitivity. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape due to proximity.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (BK-A11) which is considered to contribute moderately to the purposes of the Green Belt. The site is much smaller than the parcel assessed and therefore it could be concluded that its contribution to the purposes of the Green Belt would be less than that stated in the study.	
Flooding	Site is wholly within Flood Zone 1. 14% of the site is at low risk of surface water flooding, 7% medium risk and 6% high risk [CSN03.12].	
Environmental	According to the 2024 HELAA Update (SSA01.1), the site is adjacent to the Meadow S.W. of Shootersway Road wildlife site. There are protected trees along the boundary of the site.	
Historic Environment	The site is located within an area of archaeological significance.	
Highways Impact	Development of this site would likely result in an increase in traffic to and from the site at peak hours, which, in isolation, would have a limited impact upon the local road network. If larger scale growth is proposed in the southwest of Berkhamsted, it is likely that this would give rise to further traffic issues along Shootersway, particularly at the junction with the A416/Kings Road and the A41 junction.	



Sustainable Transport	Site is a short walking distance to the local infrequent bus services of the 502/532 and 354. Berkhamsted train station is a 30–40-minute walk and 10–15-minute cycle, and topography is noted as a constraint. Development of this site in isolation would unlikely result in enhancements to the public transport network at Berkhamsted.	
Access	Site has access onto Shootersway.	
Water and Wastewater	Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.  Wastewater: Thames Water did not envisage infrastructure concerns regarding wastewater networks in relation to this development individually, however development in this location as part of a cluster would require further detailed investigations (CD10.4, EGS12618)	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is in the vicinity of the A41 which could give rise to air and noise pollution, although this is less of an issue when compared to other sites in the area which are adjacent to the road. The site is located within 50m of the former land use risk zone associated with the Rossway Farm historic landfill. 35% of the site is located within source protection zone 2, and 65% in zone 3.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location are viable and able to deliver policy compliant levels of affordable housing. As the site is not within the catchment of an established SANG, nor is it able to identify its own solution it cannot be considered as a deliverable site.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 38)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	?	x	x	x	?	?	x	x	✓	x	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
Included as a variable allocation within the scenario testing (justification set out on page 28, paragraphs 5.4.38). Tested as part of scenario 2, 3, 6, 7, 10, 11, and 12. Within section 7 of the document officers selected scenario 4 as the preferred option (7.1.1) and specifically noted that “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” and that “The Council is equally unable to identify a Council-led Strategic SANG at key locations such as Berkhamsted”.

#### Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)

Included in scenario testing and progressed as a variable in scenario 1, 3, 4, 6, 9 and 10. The justification for this is set out in paragraphs 5.4.33 to 5.4.36, although this notes secondary school capacity, noise pollution, and the lack of a SANG solution. This site did not form part of the Council’s preferred scenario 7 (7.1.1).

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B10)	Site is proposed for an allocation of up to 100 dwellings, with public open space.
2020 Justification (PCD05.3, pg. B10)	Site performs reasonably well with respect to identified constraints, which are likely to be addressed through appropriate mitigation. Officers consider that the capacity identified in the Site Assessment Study is not fully reflective of the particular merits of the site, and consider that the development potential of the site should be optimised. While the impact of development on the local highway network is likely to be less than with other sites, a joined up approach to delivering highway improvements, particularly along Shootersway and the junction with the A416, is needed to ensure any significant impacts are sufficiently mitigated.

2023 Recommendation (PCD01.1, page 12)	Deleted as an allocation
2023 Justification	The site was deleted as a draft allocation on the basis that it was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	The site is not proposed as an allocation.
2024 Justification	Officers consider that the omission of this site is justified, as the evidence confirms that the overall potential for growth within the settlement of Berkhamsted is limited due to infrastructure capacity constraints regarding secondary school provision, and the evidence suggests that there is currently no solution proposed to mitigate this within the west of the town that would allow for more growth to be considered. As officers are required to work within the capacity constraints of the existing secondary school, it is considered there are sites which perform better in relation to their identified constraints, as Berk019R, Berk020R and Berk025R are located on weaker contributing Green Belt and can provide more sustainability benefits. Officers’ concerns remain regarding larger scale growth to the west of the town and the impact that this can have on Shootersway in particular, having regard to modelling evidence undertaken in 2020 (TRA05.1, Paragraph 5.5.3 and Figure 5-10).

**Post Submission considerations:** An outline planning application for up to 80 dwellings with access from Shootersway, public open space, landscaping, surface water drainage, and associated infrastructure (all

matters reserved except access) was received on the 10<sup>th</sup> of June 2025. This is in the process of being determined. The '09 Sep 2025 Additional Information Land at Shootersway, berkhamsted - sang update note (September 2025)<sup>12</sup>' confirms the site is not within the catchment of an established SANG, although this introduces a potential third party option which could accommodate the development once this receives planning approval.

---

<sup>12</sup>

<https://planning.dacorum.gov.uk/publicaccess/applicationDetails.do?activeTab=documents&keyVal=SY3ZUQFOIH100>

## Berk025R | Haslam Playing Fields

Description:	Site consists of existing sports playing fields which serve the pupils of Berkhamsted School and the local football club. A third of the site consists of greenfield land and separates the sports pitches from the A41. Site is bounded to the north and west by the existing built-up area of Berkhamsted, and to the east by agricultural land and the existing Local Allocation “Hanburys”.
Capacity of site	HELAA: 164 Site promoter: 100
HELAA conclusion	Deliverable: The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including self/custom build.	
Social Infrastructure	<p>Site is of a scale that is unlikely to deliver significant new social infrastructure directly.</p> <p>Officers are aware the existing state secondary school in Berkhamsted has limited expansion potential before it will be at maximum capacity. The level of development proposed is not of a scale which would exceed this. The site is not of a scale which could deliver a secondary school on site.</p>	
Green Infrastructure	<p>A reduced scale of development of this site would provide an area of open space which would meet green infrastructure needs generated by the development as required by the emerging local plan. The site is within the catchment of an established SANG (Westbrook Hay).</p> <p>This site is currently in use as natural grass pitches (3.79 ha) for Berkhamsted School and there are existing deficiencies in outdoor sports provision within the settlement. At Regulation 18 (2023) Land at Haresfoot Farm (7.95 ha) was promoted to provide replacement facilities and additional capacity. This would mitigate for the loss of facilities, accommodate demand for natural grass pitches generated by the development and make a significant contribution towards wider needs. The linked replacement provision would need to be secured by legal agreement, and include community use, to make development of the playing fields acceptable.</p>	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have moderate landscape sensitivity, with low-moderate sensitivity along the south-western edge due to closer proximity and relationship with A41. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (Parcels D-S2a) which is considered to make the least contribution to the purposes of the Green Belt. The site is much smaller than the parcel assessed and therefore it could be concluded that its contribution to the purposes of the Green Belt would be less than that stated in the study. The Stage 3 Green Belt Study (2020) recommended	

	<p>boundary strengthening along the south-eastern boundary of the site, but recognised the A41, Dennys Lane and Shootersway as readily recognisable and likely to be permanent.</p> <p>In 2020 it was expected that the whole site would be made available for residential development (150 dwellings) however the original promotion for the site was for 100 dwellings, using the southern parcel for open space. Officers consider that this site could have a Green Belt boundary which follows a line of existing mature hedgerows that could be strengthened further, and that this boundary is also readily recognisable and likely to be permanent.</p>	
Flooding	Site is within Flood Zone 1. A small area in the eastern part of the site is at risk of surface water flooding. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	There are no identified environmental or ecological constraints associated with this site. As part of their representations to the Emerging Strategy for Growth, Hertfordshire County Council's ecologist recommended the provision of a green corridor along the south-western edge of the site, which could be achieved through the reduced scale of development.	
Historic Environment	Development of the site is unlikely to impact upon the setting and location of heritage assets in the area. The site is adjacent to an area of archaeological significance.	
Highways Impact	<p>Development of this site would result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network.</p> <p>If larger scale growth is proposed in the south west of Berkhamsted, it is likely that this would give rise to further traffic issues along Shootersway, particularly at the junction with the A416/Kings Road and the A41 junction.</p>	
Sustainable Transport	Site is a 15–20-minute walk from the frequent 500, 501 service to Watford. The 502 and 532 bus service to Hemel Hempstead is a 10-minute walk and is infrequent in comparison to the 500, 501 service. Site is also 25–35-minute walk to Berkhamsted train station. and 10 minute cycle although topography is recognised as a constraint within the town. Development of this site in isolation would unlikely result in enhancements to the public transport network in Berkhamsted.	
Access	Site has existing access onto Shootersway.	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Thames Water have confirmed through their May 2024 Representations to the Infrastructure Delivery Plan (IDV01.1) that based on the information available they do not envisage infrastructure concerns regarding the capacity or capability of the wastewater network or wastewater treatment infrastructure in relation to this site.</p>	

Other Utilities	No major power lines/pylons or gas pipelines traverse the site, the site is adjacent to an electricity substation. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is in the vicinity of the A41 which could give rise to air and noise pollution. The site is underlain by a Principal Aquifer, 13% of the site is located within source protection zone 2, and 87% in zone 3, and therefore consideration should be given to Controlled Waters a receptor to any potential ground contamination.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 38)															
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment	
x	✓	?	?	x	x	x	?	?	x	x	✓	x	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)															
Included as a variable allocation within the scenario testing as part of a wider ‘Kingshill Way Cluster’ made up of three sites, including the smaller parcel of Berk019R and Berk020R (justification set out on page 27, paragraphs 5.4.37). Tested as part of scenario 2, 3, 6, 7, 10, 11, and 12. Within section 7 of the document officers selected scenario 4 as the preferred option (7.1.1) and specifically noted that “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” and that “The Council is equally unable to identify a Council-led Strategic SANG at key locations such as Berkhamsted”.															
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)															
Included in scenario testing and progressed as a constant. The justification for this is set out in paragraph 5.4.28, noting that there is confidence a SANG solution can be delivered. This site formed part of the Council’s preferred scenario 7 (7.1.1).															

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B12)	Site is proposed for an allocation of around 150 dwellings, with public open space.
2020 Justification (PCD05.3, pg. B12)	Site performs reasonably well with respect to identified constraints, which are likely to be addressed through appropriate mitigation. Given the site’s limited contribution to Green Belt purposes and spatial relationship with the existing

	<p>settlement of Berkhamsted, officers consider that the capacity/densities of this site should be optimised.</p> <p>Officers consider there is sufficient evidence to justify relocating the existing sports facilities to the Haresfoot campus, just south of the junction with the A41. While the impact of development on the local highway network is likely to be less than with other sites, a joined up approach to delivering highway improvements, particularly along Shootersway and the junction with the A416, is needed to ensure any significant impacts are sufficiently mitigated.</p>
--	---

2023 Recommendation (PCD01.1, page 12)	Deleted as an allocation
2023 Justification	The site was deleted as a draft allocation on the basis that it was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is proposed as an allocation for 100 dwellings
2024 Justification	<p>Officers continue to support the allocation of Berk019R, which taking into account secondary school capacity constraints within the settlement and the significant constraints associated with the only site of a sufficient size to deliver a new secondary school (Berk031R), limits the number of further sites which could be considered before the proposed capacity at Ashlyns would be exceeded.</p> <p>This site is considered to perform sequentially than alternative sites promoted in the settlement, particularly being located within weakest performing Green Belt. Development in this location will also be closely located to new facilities being delivered on site Berk019R, promoting sustainable patterns of development.</p> <p>It is also within the catchment of an established SANG solution. The site is also able to deliver an area of green space on-site to meet deficiencies in the settlement and can deliver replacement sports facilities at a much larger scale than what is being lost on the site, supported in principle by Sport England.</p>



## Berk026R | Ivy House Lane and Grovefield

Description	Agricultural land bounded to the north, west and south by the built-up area of Berkhamsted, and to the east by open agricultural land.
Capacity of site	HELAA: 129 Site promoter: 100
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including self/custom build.	
Social Infrastructure	Site is of a scale that is unlikely to deliver new social infrastructure on-site.  Officers are aware the existing state secondary school in Berkhamsted has limited expansion potential before it will be at maximum capacity. The level of development proposed is not of a scale which would exceed this. The site is not of a scale which could deliver a secondary school on site.	
Green Infrastructure	The site is within the catchment of an established SANG (Westbrook Hay).	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have "neighbourhood" landscape value, with moderate landscape sensitivity. The HELAA 2024 (SSA01.4) noted that the site is adjacent to the Chilterns National Landscape and is likely to impact its setting but noted that the site is inset within the residential settlement pattern to the north, west and south and by Ivy House Lane to the east.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (BK-A7) which is considered to contribute weakly to the purposes of the Green Belt.	
Flooding	Site is within Flood Zone 1. 9% of the site is at low risk of surface water flooding, 4% medium risk and 1% high risk.	
Environmental	The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation. There are no other identified environmental or ecological constraints associated with this site.	
Historic Environment	There is one grade II listed building within 100m of the site.	
Highways Impact	Development of this site would result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network.	
Sustainable Transport	Site is not within reasonable distance from frequent bus services. The 500 services to both Watford and Aylesbury, and the Berkhamsted Train Station are a 20–25-minute walk from the site. Development of this site in isolation would unlikely result in enhancements to the public transport network at Berkhamsted.	
Access	The site is accessible from Ivy House Lane; however, Ivy House Lane is considered not suitable to serve residential development of the scale	

	associated with this site. Any technical solution proposed for Ivy House Lane is also likely to impact the Chilterns National Landscape. It has not been made clear to officers how and where safe site access could be provided via Hunter's Park to the West, however an alternative proposal for access via Meadway (private road) to the southwest could be technically feasible. In any case, there is no evidence of how safe pedestrian access to and from the site would be provided with the wider town.	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Local upgrades may be required to ensure sufficient capacity is available ahead of development.</p>	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), 100% of the site is located within Source Protection Zone 2 and therefore consideration should be given to Controlled Waters as a receptor to any potential ground contamination. In addition, the site is located within a radon affected area with a radon potential band of 3-5%, requiring the adoption of basic radon protective measures for new developments.	
Minerals and Waste Considerations	Site is not located in a Mineral Safeguarding Area	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location are viable and able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 38)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	-	x	x	x	-	?	x	x	✓	x	x	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
<p>This site was not progressed to scenario testing.</p> <p>5.4.40: 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.</p>														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														

Included in scenario testing and progressed as a variable in scenario 1 and 4. The justification for this is set out in paragraph 5.4.38, although this notes access, the AONB, and the lack of a SANG solution. This site did not form part of the Council's preferred scenario 7 (7.1.1).

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B16)	Site is not proposed as an allocation
2020 Justification (PCD05.3, pg. B16)	Site performs reasonably well on a number of constraints, most of which are likely to be addressed through appropriate mitigation. A key constraint to development in this location is in respect to safe site access from Ivy House Lane, however a technical solution is likely to be feasible from other local roads in the area. Spatially, the site is distant from other sites which have the potential to deliver significant new infrastructure such as new schools and community hubs, important to delivering the strategy for Berkhamsted. For these reasons, officers consider that there are more appropriate locations in Berkhamsted which are capable to delivering the strategy.

2023 Recommendation	Site is not proposed as an allocation
2023 Justification	Officer recommendation from 2020 is unchanged. The site was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5). Officers also remain concerned with regards to identifying safe and suitable access on this site.

2024 Recommendation	Site is not proposed as an allocation
2024 Justification	Officer recommendation is unchanged. The overall potential for growth within the settlement of Berkhamsted is limited due to infrastructure capacity constraints (education), and officers consider there are sites which perform better in relation to their identified constraints, particularly as it remains unclear how suitable safe access can be provided to this site for both vehicles and pedestrians alike.

## Berk030R | Land between Shootersway and A41 (Rossway Farm)

Description	Agricultural land bounded to the north, west and south by the built-up area of Berkhamsted, and to the east by open agricultural land.
Capacity of site	HELAA: 230 Site promoter: 200
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including self/custom build. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing.	
Social Infrastructure (including, where relevant, Education, Health, Community Facilities and Emergency Services)	Site is of a scale that is unlikely to deliver significant new community services and facilities directly.  Officers are aware the existing state secondary school in Berkhamsted has limited expansion potential before it will be at maximum capacity. The level of development proposed is not of a scale which would exceed current capacity at Ashlyns in isolation, however if this is considered as part of a cluster this would require further investigation. The site is not of a scale which could deliver a secondary school on site.	
Green Infrastructure	During the Revised Strategy for Growth consultation, a 3.5 ha on-site SANG was promoted on this site. Officers consider that this would not meet SANG criteria due to size and location (e.g. achieving 2.3km circular walk and noise disturbance from A41).  The site is not within the catchment of an established SANG, although it is within the catchment of a SANG solution proposed to be delivered later within the Plan period (Hill Farm gateway, or People's Park). It is noted that Policy NE5 of the publication version of the Local Plan will require developments of 100 homes or more to seek their own SANG solution.  The site is beyond catchment of existing open space provision and would need to meet its needs for open space on site in full and contribute towards offsite sports provision.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have "neighbourhood" landscape value, with low-moderate landscape sensitivity. The HELAA 2024 (SSA01.4) identified that the site is not within the Chilterns National Landscape but may impact the setting due to its proximity.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (BK-A11) which is considered to contribute moderately to the purposes of the Green Belt. The Stage 3 Green Belt Study (2020) recommended strengthening if the site should be removed from the Green Belt, and that land to the south-east of the site should also be removed.	
Flooding	The Dacorum Level 2 Strategic Flood Risk Site Assessments (Aug 2024 CSN04.2) confirmed that the site is within Flood Zone 1. 19% of the site is	

	at a low risk of surface water flooding, with 6% at medium risk, and 2% high.	
Environmental	According to the 2024 HELAA Update (SSA01.1), The site is adjacent to the Meadow S.W. of Shootersway Road wildlife site.	
Historic Environment	Most of the site is located within an area of archaeological significance.	
Highways Impact	Development of this site would result in an increase in traffic to and from the site at peak hours. If larger scale growth is proposed in the southwest of Berkhamsted, it is likely that this would give rise to further traffic issues along Shootersway, particularly at the junction with the A416/Kings Road and the A41 junction.	
Sustainable Transport	Site is of short walking distance to the local infrequent bus services of the 502/532 and 354.	
Access	The site has existing access from Shootersway.	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: The scale of development/s is likely to require upgrades to the wastewater network (CD10.4, EGS12621).</p>	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is in the vicinity of the A41 which could give rise to air and noise pollution. c. 25.1 ha of the site is located within a former land use risk zone associated with historic landfill. The site is underlain by a Principal Aquifer, 47% of the site is located within source protection zone 2, and 53% in zone 3, therefore consideration should be given to Controlled Waters. In addition, a historic inert landfill is present on-site, considered to be a potential source of on-site contamination. Furthermore, Made Ground is expected on-site due to the historic development of the site.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site. The site is located within the Brick Clay Mineral Safeguarding Area. The Waste Planning authority also advised that some of the allocation is located on top of a historic landfill.	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location are viable and able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 38)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	-	x	x	x	?	?	x	x	✓	x	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
The site was not progressed to scenario testing, although it was identified as a site of note within figure 5.12. The justification for this is set out in paragraph 5.4.38, although constraints identified included the adjacent AONB, heritage constraints, road infrastructure and traffic constraints and the lack of a solution for secondary education capacity.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
Included in scenario testing and progressed as a variable in scenario 3, 6, 9 and 10. The justification for this is set out in paragraphs 5.4.33 to 5.4.36, although this notes secondary school capacity, noise pollution, and the lack of a SANG solution. This site did not form part of the Council's preferred scenario 7 (7.1.1).														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B18)	Site is proposed as an allocation for around 200 dwellings
2020 Justification (PCD05.3, pg. B18)	Site performs reasonably well on a number of constraints, which are likely to be addressed through appropriate mitigation. In reviewing AECOM's Site Assessment Study conclusion for this site, officers consider that the impact of development on the AONB would likely be less harmful when compared to other sites. This is further justified through landscape evidence which concludes a low-moderate sensitivity to development of the site. While the impact of development on the local highway network is likely to be less than with other sites, a joined up approach to delivering highway improvements, particularly along Shootersway and the junction with the A416, is needed to ensure any significant impacts are sufficiently mitigated. Overall, the site is likely to make a significant contribution towards the delivery of new and enhanced infrastructure, services and facilities for new and existing communities in the area, and forms a logical rounding off of development to the south-west of Berkhamsted/Northchurch.
2023 Recommendation (PCD01.1, page 13)	Deleted as an allocation
2023 Justification	The site was deleted as a draft allocation on the basis that it was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is not proposed as an Allocation

2024 Justification	<p>Officers consider that the omission of this site is justified, as the evidence confirms that the overall potential for growth within the settlement of Berkhamsted is limited due to infrastructure capacity constraints regarding secondary school provision, and the evidence suggests that there is currently no solution proposed to mitigate this within the west of the town that would allow for more growth to be considered. As officers are required to work within the capacity constraints of the existing secondary school, it is considered there are sites which perform better in relation to their identified constraints, as Berk019R, Berk020R and Berk025R are located on weaker contributing Green Belt and can provide more sustainability benefits.</p> <p>Officers concerns remain regarding larger scale growth to the west of the town and the impact that this can have on Shootersway in particular, having regard to modelling evidence undertaken in 2020 (TRA05.1, Paragraph 5.5.3 and Figure 5-10).</p>
--------------------	--



## Berk031R/Berk032R | East of Berkhamsted

Description	Agricultural land bounded to the west by the built-up area of Berkhamsted and agricultural land (site: South of Berkhamsted), to the south by the A41, to the north by London Road and to the east by A41 services, employment land and the existing settlement of Bourne End.
Capacity of site	HELAA: Berk031R: 1682 dwellings. Berk032R: 231 dwellings. Site promoter: 1000 dwellings across both parcels.
HELAA conclusion	Berk031R: Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan. Berk032R: Not developable: the site is not likely to be developable within the period of the Local Plan.

The Council assessed Berk032R as being unsuitable for residential use, as the HELAA identified constraints which significantly inhibit this type of development<sup>13</sup>. The following assessment considers the Berk031R site only and any references to ‘the site’ refer to this parcel in isolation. However as the same developer promotes parcels, reference to Berk032R is made where it is relevant (i.e. Green Infrastructure).

Housing & Economy	<p>The site is of a scale which would be able to deliver a range of house types, including provision for older people and other forms of specialist housing including self/custom build. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing (c.400 affordable homes).</p> <p>Officers consider the capacity of the site is likely to be lower than 1000 homes if the parcel of residential dwellings promoted on the eastern part of Berk032R is deleted. The 2020 consultation masterplan promoted 1000 homes on Berk31R, with Berk032R as a country park, however the 2020 Regulation 18 representations included development on Berk032R (including on land within the functional floodplain).</p>	
Social Infrastructure (including, where relevant, Education, Health, Community Facilities and Emergency Services)	<p>Development of homes at this scale would likely support the delivery of additional on-site local services such a retail and community buildings, sports and leisure facilities, health services and a primary and secondary school, and to serve existing and future communities.</p> <p>The level of development proposed would exceed the current capacity at Ashlyns in isolation but only by a limited extent. However, officers contend that it is not appropriate to consider the development of this site without the development of Berk019R, which would exceed current capacity more significantly. The site is a sufficient scale to deliver a secondary school on site and previous land promotions have identified a potential location for this.</p>	
Green Infrastructure	During the Revised Strategy for Growth, a 19.2 ha on-site SANG network was promoted on the site and the Berk032R parcel. Officers consider that this is unlikely to meet the minimum SANG requirements, due to its fragmented design and location (it is not possible to deliver a 2.3km walk	

<sup>13</sup> The full assessment and justification for this is set out within the HELAA Appendix C (SSA01.4) pages 69 - 70.

	<p>in one parcel or without crossing the highway multiple times (A4251 London Road and several proposed internal roads), and there will be noise disturbance from A41 and A4251). The site is within the catchment of an established SANG at Westbrook Hay, however the significant scale of this development is unlikely to be accommodated, owing to capacity of that SANG already serving other large developments in the area.</p> <p>This site would meet its open space needs in full and include outdoor sports provision to meet its own needs and make a significant contribution towards deficiencies within the settlement. Community access to facilities provided at educational facilities would be required.</p>	
Landscape	<p>In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1) considers that the entire site has a high landscape sensitivity.</p> <p>The HELAA 2024 (SSA01.4) identified that the site is not within the Chilterns National Landscape but may impact the setting due to its proximity. The landscape sensitivity study notes that views are open across the valley to the north including views of Chilterns AONB.</p>	
Green Belt Evaluation	<p>The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (BK-A10) which is considered to contribute strongly to the purposes of the Green Belt. It is likely that development would significantly visually or physically reduce the perceived and actual distance between the towns of Berkhamsted and Hemel Hempstead.</p>	
Flooding	<p>The Berk031R site is wholly within Flood Zone 1, with a small area at risk of surface water flooding (2% of the site is at low risk, 1% medium risk and 1% high risk). Flooding from groundwater is not likely in most of the site. This risk increases to subsurface assets in land towards Bourne End and London Road, but it is unlikely for this to reach the surface level.</p>	
Environmental	<p>According to the 2024 HELAA Update (SSA01.1), a very small area of the site overlaps the Long Green Local Wildlife Site (located primarily on Berk019R). There are no other identified ecological constraints associated with the Berk031R site.</p>	
Historic Environment	<p>23% of Berk031R is within an area of archaeological significance, as a small area (758m<sup>2</sup>) is within 100m of the Berkhamsted conservation area.</p>	
Highways Impact	<p>Development is likely to have an impact on the local road network at peak periods, including the London Road, Chesham Road and the A416.</p> <p>Development of Berk031R tandem with Berk019R could provide a new link road between Chesham Road and London Road, which would alleviate traffic through the centre of Berkhamsted. A new access to the A41 from the site would also limit additional traffic along Shootersway and Kingshill Way when compared to alternative proposed sites within Berkhamsted.</p>	
Sustainable Transport	<p>Site is situated next to the frequent 500 bus service to Aylesbury. Berkhamsted train station is a 30-45 minute walk and 10-15 minute cycle. A site of this scale would likely provide enhancements to local public transport services including new bus routes.</p>	

Access	The site will be accessed from the A4251 London Road and Stoney Lane adjacent to the A41 junction.	
Water and Wastewater	<p>The site is located within the Waste Authority site consultation area of the Berkhamsted water recycling centre.</p> <p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Local upgrades are likely to be required to ensure sufficient capacity is available ahead of development.</p>	
Other Utilities	<p>The HELAA (2024) notes that the site contains several overhead powerlines, including a major powerline which is likely to restrict development within the main parcel of the site. The site also contains a gas pipe.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is in the vicinity of the A41 which could give rise to air and noise pollution. The site is located within the Waste Authority site consultation area of the Berkhamsted water recycling centre and is within 50m of the former land use risk zones associated with the treatment of timber, road haulage and the petrol station, which are potential sources of contamination. The site is underlain by a Principal Aquifer, with 31% of the site located within Source protection zone 1, 48% in zone 2 and 21% in zone 3.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location are viable and able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 38)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	✓	?	?	x	✓	?	x	?	?	xx	x	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
<p>This site was not progressed to scenario testing.</p> <p>5.4.40: 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.</p>														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														

Included in scenario testing and progressed as a variable in scenario 2, 3, 5, 6, 8, 9 and 10. The justification for this is set out in paragraphs 5.4.31 and 5.4.32, confirming that the 2023 site promoter representation confirmed that this site could deliver a secondary school, which would address a key capacity issue on the town, but also noting Green Belt and landscape constraints, and that the secondary school is located on sloping land distant from the town. This site did not form part of the Council's preferred scenario 7. Paragraph 7.1.1 sets out that the reason for selecting scenario 7 over scenario 8, which also performed well against the sustainability objectives and was also ranked first, was the fundamental issue of coalescence the development of site Berk031R would result in.

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B21)	Site is not proposed as an allocation
2020 Justification (PCD05.3, pg. B21)	The site suffers from a number of constraints, principally relating to Green Belt and landscape sensitivities including the potential for development to impact the setting of the Chilterns. Development of the whole of the site would erode the important open gap separating Berkhamsted with Bourne End village and with Hemel Hempstead. Officers considered a smaller scale of growth which would reduce the impact on a number of these issues, however additional evidence has concluded that landscape sensitivity remains high. In reviewing proposed mitigation measures for the site, officers are not confident that a smaller scale of development will result in a less than significant impact on the immediate and wider landscape including the setting of the Chilterns AONB. Officers have given serious consideration to the sustainability merits of the site, including the potential to deliver significant new infrastructure such as new education provision, a new community hub, public open space, potential new sports/leisure facilities and a new link road linking London Road with the A416 (via site 2: South of Berkhamsted). Currently officers do not consider the merits of the site outweigh the impact that development would have on landscape, particularly the setting of the CAONB and in terms of the impact development would have on the role and function of the Green Belt in this location, eroding the gap between the settlements of Berkhamsted and Hemel Hempstead; both of which would be significant. On balance, officers consider there are more appropriate sites elsewhere which can deliver the strategy and which will not give rise to such significant impacts.

2023 Recommendation (PCD01.1, page 12)	Site is not proposed as an allocation
2023 Justification	Officer recommendation from 2020 is unchanged. The site was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution that met the expected SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is not proposed as an allocation
2024 Justification	Officers consider that there are clear landscape constraints to strategic growth east of Berkhamsted, as well as transport (also potentially air quality) issues that would need to be investigated in detail, including accounting for cumulative traffic impacts. Officers maintain their view that the benefits of

	land East of Berkhamsted is not outweighed by its Green Belt and Landscape impacts, particularly as development of this site raise fundamental issues of visual and perceived coalescence between Hemel Hempstead and Berkhamsted.
--	--

**Pre-Submission considerations:**

**Social Infrastructure:** It is noted that the Regulation 20 representation by the site promoter has omitted the proposed secondary school from the site (despite this being a significant identified benefit of the site and a large part of the justification for its re-consideration within the Sustainability Appraisal process in CD03.1). The representation states that this was deleted due to a lack of need, due to the proposed provision at Land East of Tring, but confirms that land could be made available on the site for a secondary school if it is required. Officers consider that it is unclear where the land for a secondary school could be found on the site when referring to the most recent proposal, as the area of land which was previously suggested for this use in 2023 has now been colour coded as SANG (secured in perpetuity for 80 years).

## Berk033R | Land east of Darrs Lane

Description	Two parcels of agricultural land, all located to the west of the existing built-up area. The larger parcel of land is bounded by the built-up area to the north, the smaller parcel of land, open land and sports pitches to the east, agricultural land to the south, and the Chilterns National Landscape to the west at the site border with Darrs Lane, including agricultural land and low-density residential development. The smaller parcel is bounded by built-up area of Northchurch to the north and east, by Bell Lane and the larger parcel (currently open agricultural land) to the west and by woodland to the south.
Capacity of site	HELAA: 238 (an area of 11.41 ha was deducted from the site capacity calculation, due to the overlap with a promoted onsite SANG). Site promoter:
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including provision for older people and other forms of specialist housing including self/custom build. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing.	
Social Infrastructure	<p>The site is of a scale that could deliver some additional community facilities for Berkhamsted on-site.</p> <p>Officers are aware the existing state secondary school in Berkhamsted has limited expansion potential before it will be at maximum capacity. The level of development proposed is not of a scale which would exceed current capacity at Ashlyns in isolation, however if this is considered as part of a cluster this would require further investigation.</p> <p>Officers note that this site was proposed as a draft allocation as part of a cluster within the Emerging Strategy for Growth Regulation 18 (2020), and Hertfordshire County Council requested an 8FE secondary school on this site to accommodate the level of proposed growth. This site is of a sufficient size that could provide a secondary school; however, this would significantly reduce the ability of the site to deliver housing. Officers agree with paragraph 5.4.34 of CD03.1, which highlights that there is no evidence that landowners are collaborating in this way to achieve this.</p>	
Green Infrastructure	At RSG a 11.41 ha SANG network was promoted. This would not meet SANG criteria (e.g. 2.3-2.5km unable to be achieved on one parcel). Taylor Wimpey may access SANG provision at Castle Hill (granted permission for change of use to SANG 03/09/24) and Haresfoot Farm (granted permission for change of use to SANG 23/09/24), both of which are within the catchment of the development. The site is beyond catchment of existing open space provision and would need to meet its needs for open space on site in full and provide onsite sports provision.	

Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have "neighbourhood" landscape value, with moderate landscape sensitivity, and moderate-high landscape sensitivity in the southern plateau surrounded by low density development. The HELAA 2024 (SSA01.4) identified that the site is not within the Chilterns National Landscape but may impact the setting due to its proximity.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (BK-A12) which is considered to contribute moderately to the purposes of the Green Belt. The Stage 3 Green Belt Study (2020) noted that the highway separating the split site should also be removed from the Green Belt if allocated.	
Flooding	Site is within Flood Zone 1. 0.2% of the site has a risk of surface water flooding [CSN03.12].	
Environmental	According to the 2024 HELAA Update (SSA01.1), 59.64% of the site is within agricultural land classification grade 3. The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation. There are no other ecological or environmental constraints associated with this site.	
Historic Environment	The site is adjacent to the Grim's Ditch Scheduled Monument. There is one grade II listed building within 100m of the site. 17% of the site is located within an area of archaeological significance. This runs through the centre of the site and is associated with the adjacent monument.	
Highways Impact	Development is likely to have an impact on the local road network at peak periods, including along Shootersway and Kings Road/A416. Significant improvements would likely be required, including enhancements to Darr's Lane, Durrants Lane, Berkhamsted High Street, Shootersway, Kings Road and the A416.	
Sustainable Transport	Site is within walking distance to the frequent 500 bus services to both Watford and Aylesbury. Site is also within walking distance to the less frequent bus service of 532 to Hemel Hempstead. A site of this scale has the potential to provide new/enhanced public transport connections with the existing town and wider area.	
Access	Existing access is available from Darr's Lane and Durrants Lane, although Bell Lane is not considered suitable for Vehicle access.	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Local upgrades may be required to ensure sufficient capacity is available ahead of development. Thames Water required more information regarding the secondary school capacity before making an assessment on capacity (CD10.4, EGS12619).</p>	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is in the vicinity of the A41 which could give rise to air and noise pollution. The site is	



	located within 50m of the former land use risk zone associated with the manufacture of bricks and clay, and 87% of the site is located within source protection zone 2, and 13% in zone 3.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location are viable and able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 38)															
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment	
x	✓	?	-	x	x	x	?	x	x	✓	✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)															
The site was not progressed to scenario testing, although it was identified as a site of note within figure 5.12. The justification for this is set out in paragraph 5.4.38, although constraints identified included the adjacent AONB, heritage constraints, road infrastructure and traffic constraints and the lack of a solution for secondary education capacity.															
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)															
Included in scenario testing and progressed as a variable in scenario 3, 6, 9 and 10. The justification for this is set out in paragraphs 5.4.33 to 5.4.36, although this notes secondary school capacity, noise pollution, and the lack of a SANG solution. This site did not form part of the Council's preferred scenario 7 (7.1.1).															

## Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B23)	Site is proposed for an allocation of around 200 dwellings, significant new/enhanced public open space and safeguarded land for a new secondary school.
2020 Justification (PCD05.3, pg. B23-24)	<p>The site suffers from a number of constraints, which impact the development potential of the site. Part of the site includes the route of Grim's Ditch, and a suitable buffer should be applied to avoid development in this location. Additionally, Woodcock Hill is a Locally Registered Park and Garden exists on land to the east of Bell Lane. This land could be enhanced as a public park serving existing and future communities.</p> <p>While the impact of development on the local highway network is likely to be less than with other sites, a joined up approach to delivering highway improvements, particularly along Shootersway and the junction with the A416, is needed to ensure any significant impacts are sufficiently mitigated.</p> <p>Part of the site to the north west is identified as a potential suitable location for a new secondary school, and is safeguarded from any other forms of development. The southern part of the site, closest to Shootersway is identified as having some development potential.</p>

	The identified constraints need to be balanced against the potential for the site to deliver key infrastructure such as primary/secondary school education. Having regard to alternatives, officers consider that the site is suitable to deliver a range of new uses, including significant open space and contribute towards the delivery of a new secondary school to the west of Berkhamsted (and Northchurch) and plays an important role in delivering the strategy of the new Local Plan.
--	--

2023 Recommendation	Deleted as an allocation
2023 Justification	The site was deleted as a draft allocation on the basis that it was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time (there was insufficient capacity at Haresfoot Farm SANG to serve this site alongside others). This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is not proposed as an Allocation
2024 Justification	<p>Officers consider that the omission of this site is justified, as the evidence confirms that the overall potential for growth within the settlement of Berkhamsted is limited due to infrastructure capacity constraints regarding secondary school provision, and the evidence suggests that there is currently no solution proposed to mitigate this within the west of the town that would allow for more growth to be considered. As officers are required to work within the capacity constraints of the existing secondary school, it is considered there are sites which perform better in relation to their identified constraints, as Berk019R, Berk020R and Berk025R are located on weaker contributing Green Belt and can provide more sustainability benefits.</p> <p>Officers concerns remain regarding larger scale growth to the west of the town and the impact that this can have on Shootersway in particular, having regard to modelling evidence undertaken in 2020 (TRA05.1, Paragraph 5.5.3 and Figure 5-10).</p> <p>Officers remains unclear on the precise SANG solution for this site, but officers note that the site promoter has other SANG options available in the area which may have sufficient capacity.</p>

## Tring016R | Dunsley Farm

Description:	Predominantly agricultural land, with some farm buildings and small-scale commercial development, bounded to the north and west by formal sports facilities, a large convenience supermarket, Tring Park and the wider built-up area of Tring. Site is bounded to the east by further sports facilities and the grounds of Pendley Manor, and to the south by the A4251 and A41.
Capacity of site	HELAA: 430 dwellings and 3.6 ha of new employment land (a deduction of 16.5 ha was made to the overall site area on the request of the site promoter as this land is not considered for built development) Site promoter: 250 and c.3ha of new employment land
HELAA conclusion	Deliverable: The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including housing for older people and self/custom build. Viability evidence suggests that greenfield sites in this location would likely be able to deliver policy compliant levels of affordable housing. The site is proposed to deliver an extension to the existing employment area located on the site (CD03.1 9.8.2).	
Social Infrastructure	The site is promoted to deliver a primary school on site.	
Green Infrastructure	SANG provision is proposed to be made available off-site at James Farm. The development is proposed to retain and enhance the Cow Lane Farm Meadows wildlife site and there are opportunities for community access to facilities provided at education facilities.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have moderate landscape sensitivity. The HELAA 2024 (SSA01.4) identified that the site may impact the setting of the Chilterns National Landscape due to its proximity.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of parcel (TR-A5) which is considered to contribute moderately to the purposes of the Green Belt. The site broadly corresponds with Parcel TR-A5 so its contribution to the purposes of the Green Belt is unchanged.	
Flooding	Site is wholly within Flood Zone 1. A small area in the centre of the site is at a higher risk of surface water flooding. Any risks are likely to be mitigated through more detailed analysis at the planning application stage.	
Environmental	The site contains the Cow Lane Farm Meadows wildlife site c. 40.51% of the site area (SSA01.4); however, this area is not proposed to be developed. Hertfordshire County Council noted that this grassland has a high ecological sensitivity. The site is also located within 800m of the Oddy Hill and Tring Park SSSI and is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation.	
Historic Environment	There are four Grade II listed buildings within 100m of the site. The site is also within 100m of the Tring Park Grade II registered park although is well screened by a mature hedgerow. The site is adjacent to an area of archaeological significance and Pendley Manor Locally Registered Park.	

Highways Impact	Development is likely to have an impact on the local road network at peak periods, including the London Road, Cow Lane and Station Road. Development of the whole parcel could provide for some enhancements to existing junctions in the area, including the Cow Lane junction with Station Road. The site could also make a positive contribution to new/enhanced sustainable transport connections with the existing town and to Tring Station.	
Sustainable Transport	Site is in walking distance with a range of frequent bus services, including the 500 service to Hemel Hempstead, Aylesbury, Watford and Berkhamsted. Development of this site could contribute towards public transport enhancements in the local and wider area.	
Access	Existing access is available from London Road.	
Water and Wastewater	Water: (CD10.4 Comment EGS12662) Thames Water raised no comments in relation to the water supply network infrastructure on this site.  Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding wastewater treatment infrastructure capability in relation to this site, although they noted that upgrades to the wastewater network are likely to be required. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), a small part of the site is located within 50m of the former land use risk zone associated with a former factory. The site is underlain by a Principal Aquifer and 57% of the site is located within Source Protection Zone 3. Site in proximity to the A41 which could give rise to noise quality issues. Any effects are likely to be mitigated through an appropriate buffer if required.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that this site would likely be viable and able to deliver policy compliant levels of affordable housing, which was confirmed by the Regulation 19 Viability Note (Sep 2024, IDV03.3).	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 39)													
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy
													SA15 Employment

x	?	?	✓	✓	x	-	?	x	✓	x	✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)															
This site was included in scenario testing as a constant, as justified within paragraph 5.4.48.															
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)															
This site was included in scenario testing as a constant, as justified within paragraph 5.4.46.															

## Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B77)	Site is proposed for an allocation of around 400 dwellings, approximately 5 hectares of new employment land to serve local needs and will deliver a new primary school.
2020 Justification (PCD05.3, pg. B77)	<p>The site performs well against a number of identified constraints, including its relationship with the existing town centre and proximity to the A41. The site is within the setting of the Chilterns AONB, although the impact of development on its setting is likely to be less when compared to alternatives. In addition to this, the eastern part of the site is currently designated a Local Wildlife Site. Officers are currently considering the merits of the Local Wildlife Site, including if it contains priority habitats and species, and are currently taking a cautious view that this land should not be developed on. Depending on the outputs of detailed survey work of this site, this situation will be reviewed prior to the plan being finalised.</p> <p>Any development would need to respect heritage assets in the area, and officers believe that can be adequately mitigated. The site's location adjacent to the junction with the A41 is also a benefit in terms of reducing impacts on the local road network, when compared to alternatives in the area, and is reasonably well positioned relative to the existing town centre and to the train station. The identified constraints need to be balanced against the site's potential to deliver important new infrastructure for the town, namely in respect to education provision and new employment land to serve local needs. Having regard to this and alternative sites, officers recommend that the site is allocated to meet the strategy of the new Local Plan.</p>
2023 Recommendation (PCD01.1, page 16)	Site is proposed as an allocation for around 250 dwellings.
2023 Justification	The site was recommended as a draft allocation broadly in line with officer recommendations in 2020. In line with representations received by Hertfordshire County Council's ecologist, the site area has been reduced to exclude the cow lane farm meadows wildlife site, therefore the quantum of development is reduced to 250 dwellings from 400. The site was supported by a bespoke third party SANG solution on land to the east of Dunsley Farm or at James Farm. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed as an allocation for around 250 dwellings.

2024 Justification	<p>The site will deliver a primary school and employment land, and benefits from particularly good proximity and links to the town centre, strategic road network and train station. It is also able to deliver SANG within the area which has the potential to unlock other developments within catchment.</p> <p>Having regard to alternative sites, this site is located within the only wider parcel surrounding Tring assessed as contributing moderately to the purposes of the Green Belt, which is not also located within the Chilterns National Landscape (all others are assessed to make a strong contribution).</p>
--------------------	--

#### **Pre-Submission considerations:**

**Green Infrastructure:** The site promoter has confirmed that they are unable to fully commit to James Farm as SANG but will continue to engage with all the relevant stakeholders to complete this assessment as soon as possible. Officers note that alternative provision could also be made at Cow Lane Farm Meadows wildlife site.

**Wastewater:** The Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required, and it is likely that upgrades to the wastewater network will be necessary. Thames Water raised no concerns in relation to the capacity of the Tring Sewage Treatment Works. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan.

## Tring018R | East of Tring

Description:	Site predominantly consists of agricultural land and is bounded to the west by the existing built-up area of Tring and agricultural land (Tring025R New Mill), to the south by Station Road and the grounds of Pendley Manor, to the east by the Grand Union Canal and to the north by the B488/Bulbourne Road. The site is bisected by Marshcroft Lane (Roman Road).
Capacity of site	HELAA: 2071 (an area of 36.26 ha was deducted from the site capacity calculation due to the overlap with a promoted onsite SANG). Site promoter: 1400
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including housing for older people and self/custom build. The site is proposed to deliver 50% affordable housing (700 affordable homes).	
Social Infrastructure	Development of homes at this scale would likely support the delivery of additional on-site local services such a retail and community buildings, sports and leisure facilities, a primary and secondary school, and health services, to serve existing and future communities.	
Green Infrastructure	At RSG site promoted to include 27 ha SANG, plus 10 ha 'supplementary SANG', up to 9 pitches, MUGA, 3G, cricket facility, sports hub and multi-use hall. This site would meet its open space needs in full and include outdoor sports provision to meet its own needs and make a significant contribution towards deficiencies within the settlement. Opportunity to widen canal green corridor for biodiversity and walking/cycling. Community access to facilities provided at education facilities should be secured.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have "neighbourhood" landscape value, with moderate-high landscape sensitivity. The HELAA 2024 (SSA01.4) identified that the site is adjacent to the Chilterns National Landscape and may impact its setting due to its proximity.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of the parcels (TR-A2 and TR-A3) which is considered to contribute strongly to the purposes of the Green Belt.	
Flooding	Site is wholly within Flood Zone 1. 10% of the site has a low risk of surface water flooding, 1% medium risk, and 1% high risk [CSN04.2]. Any risks are likely to be mitigated through more detailed analysis at the planning application stage. The site has a risk of groundwater flooding to both surface and subsurface assets.	
Environmental	1.18% of the site is priority habitat traditional orchard, and the site is adjacent to priority habitat deciduous woodland, it is considered that the site is large enough that the retention of these assets would not constrain development. The site is adjacent to the Grand Union Canal, Bulbourne to Tring Station wildlife site although land along this boundary is expected to deliver SANG. Part of the site is within 800m of the Pitstone Quarry SSSI and Tring Reservoirs SSSI.	



	The HELAA identified that 80% of the site is within agricultural land classification grade 2, however the detailed soil survey undertaken to inform the planning application confirmed this was 9%.	
Historic Environment	There are three Grade II listed buildings within 100m of the site. The site is adjacent to the Pendley Manor Locally Registered Park. Part of the south western portion of the site is located in an area of archaeological significance.	
Highways Impact	Development is likely to have an impact on the local road network at peak periods, including Station Road, Bulbourne Road and routes through to the A41 junction, including Cow Lane and London Road. Development of the whole parcel could provide a new link road through the site linking Station Road and Bulbourne Road and this would likely alleviate pressures on some routes such as Brook Street.	
Sustainable Transport	Site is within walking distance to the frequent local bus services to Tring, as well as the 61 and 164 services to Aylesbury with a frequency of every 30minutes to 1 hour. Site is also within walking distance to the less frequent bus services to Dunstable, Ivinghoe and Pitstone. Site is in reasonable distance to Tring train station. Development of this site could contribute towards significant public transport enhancements in the area, including the delivery of dedicated new bus services.	
Access	Existing access is available from Bulbourne Road and access is likely to be provided onto Station Road. Marshcroft Lane is not suitable for vehicular access. Further linkages could be provided through the adjacent Site 132 – New Mill.	
Water and Wastewater	<p>Water: (CD10.4 Comment EGS12664) Thames Water raised that the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure</p> <p>Wastewater: (CD10.4 Comment EGS12664) Thames Water raised that the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development and that strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development.</p>	
Other Utilities	<p>No major power lines/pylons traverse the site. An oil pipeline traverses the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	The site is within the Waste Authority site consultation area for the Tring Sewage works.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing,	

	which was confirmed by site-specific viability testing in 2024 through the Regulation 19 Viability Note (Sep 2024, IDV03.3).	
--	--	--

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 39)																
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment		
x	✓	?	?	x	✓	x	✓	xx	-	x	x	✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)																
Included as a variable allocation within the scenario testing (justification set out on page 30, paragraphs 5.4.50). Tested as part of scenario 11 and 12. Within section 7 of the document officers selected scenario 4 as the preferred option (7.1.1) and specifically noted landscape constraints and the setting of the AONB, and also stated that “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”.																
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)																
Included in scenario testing and progressed as a variable in scenario 4, 5, 6, 7, 8, 9 and 10. The justification for this is set out in paragraph 5.4.47. This site formed part of the Council’s preferred scenario 7 (7.1.1).																

## Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B80)	Site is proposed for an allocation of around 1,400 dwellings, a new community hub with sports and leisure facilities, primary and secondary school education, and a new link road between Bulbourne Road and Station Road.
2020 Justification (PCD05.3, pg. B80)	<p>The site performs well against a number of identified criteria, including in particular the site’s relationship to the train station. The site forms part of the setting of the Chilterns AONB which gives rise to additional landscape sensitivities. Officers consider that these impacts can be mitigated through the delivery of a new landscape structure across the site, and the delivery of a linear park parallel to the Grand Union Canal should deliver additional screening as well as sufficient Suitable Alternative Natural Greenspace to offset recreational impacts on the Chiltern Beechwoods SAC.</p> <p>The site has the potential to deliver significant new social and community infrastructure to benefit both new and existing communities, when compared to some alternative sites. These include a new community hub, formal and informal recreation space, a primary and secondary school, a new link road between Bulbourne Road and Station Road, and high quality sustainable transport links to the town centre and to the train station. On this basis, officers recommend that the site.</p> <p>Spatially, the site’s relationship with the adjacent site New Mill is critical to ensuring the sustainable movement of people through the settlement and it is important that this opportunity is maximised to ensure the Tring place strategy is delivered.</p>

2023 Recommendation (PCD01.1, page 16)	Deleted as an allocation
2023 Justification	The site was deleted as a draft allocation based on the harm to the green belt, reflecting the Government's draft changes to the Framework at the time of consultation. The site was refused planning permission (REF: 22/01187/MOA) in October 2022 for similar reasons. The refused scheme was subject to appeal (REF: APP/A1910/W/22/3309923) at the time of the 2023 consultation. The site benefited from an on-site SANG solution. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is proposed for an allocation of around 1,400 dwellings
2024 Justification	<p>With regards to Tring, officers agree with the sustainability appraisal's conclusions in support of allocating East of Tring and that it is able to deliver a comprehensive urban extension. Officers recognise the well-understood sensitivities including given the relationship of this land parcel to the Chilterns National Landscape.</p> <p>The allocation of this site alongside New Mill (Tring025R) allocation represents a logical and comprehensive extension to the town on land between Bulbourne Road and Station Road, which promotes sustainable patterns of development by delivering new and enhanced links with Tring Station and providing greater opportunities for integration with existing communities through the provision of new community and leisure facilities.</p> <p>In coming to a final recommendation, officers also had regard to the Secretary of State Appeal Decision (Mar 2024) (SSA06.1) which confirmed that there was no technical issue with the delivery of the site and that identified impacts could be sufficiently mitigated in a manner consistent with national policy. The Decision was refused solely on grounds of the balance of harm to the Green Belt relative to its benefits as part of the Very Special Circumstances test. Officers, through separate evidence (SSA07.1), consider that exceptional circumstances now exist to remove this site from the Green Belt.</p>

#### **Pre-Submission considerations:**

Wastewater the Regulation 20 representation from Thames Water stated that for this site, on the information provided, modelling will be required and it is likely that upgrades to the wastewater network will be necessary. Thames Water raised no concerns in relation to the capacity of the Tring Sewage Treatment Works. Officers determined that this change in position from 2023 would not prevent the site from being delivered during the period of the Local Plan. It is noted that water supply was highlighted as red in the water assessment RAG, it is considered that this reflects the position set out in 2020.

**Post-Submission Considerations:** A resubmitted planning application for this site was received in August 2025 (25/01880/MOA).

## Tring020R | Land North of Ickneild Way

Description:	Agricultural land bounded by sports uses and open agricultural land to the northwest and west, the Grand Union Canal and Chilterns National Landscape to the northeast, a waterbody followed by residential development to the east, and the Ickneild Way followed by the main built up area of Tring to the south of the site.
Capacity of site	HELAA: 219 Site promoter: 226
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including self/custom build.	
Social Infrastructure	Site is of a scale that is unlikely to deliver social infrastructure directly, although it can provide public open space. A site of this size is likely to result in capacity constraints with existing facilities and would be expected to contribute towards these.	
Green Infrastructure	The site is not promoting its own SANG solution on or off site. It will be within the catchment of Hill Farm Gateway SANG (expected to delivered later in the local plan period) or SANG delivered with Dunsley Farm. Development would be expected to meet its open space needs on-site (Policy HC5) and contribute towards offsite sport and leisure provision.	
Landscape	The HELAA 2024 (SSA01.4) identified that the site may impact the setting of the Chilterns National Landscape due to its proximity, and noted that the southern part of the site is elevated, from which the landform falls northwards to the Grand Union Canal and that this slope increases visibility from this site to the Chilterns. As the site was not recommended for further testing in SSA03.3, it was not assessed by CSN10.1.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of the larger parcel (TR-A9) which is considered to contribute strongly to the purposes of the Green Belt. The wider parcel was recommended to be excluded from any further assessment due to its constraints and contribution to the purposes.	
Flooding	The site contains a small amount of surface water flood risk. There is a risk of groundwater flooding to both surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally.	
Environmental	According to the 2024 HELAA Update (SSA01.1), the site is located within 300m from the Tring Reservoirs SSSI. The Grand Union Canal (Wendover Arm) is located along the norther boundary of the site. The site is 166 metres of Tring Reservoirs Nature Reserve. 100% of the site is within agricultural land classification grade 2, meaning development would result in the loss of best and most versatile agricultural land.	
Historic Environment	The site does not have any identified heritage constraints.	
Highways Impact	Development of this site would likely result in an increase in traffic to and from the site at peak hours.	
Sustainable Transport	Site is within walking distance to a range of bus services providing for the local area which are, however, infrequent. Site is distant from frequent bus services to Watford and Aylesbury. Development of this site in	

	isolation is unlikely to deliver enhancements to the public transport network in the area.	
Access	The site is accessible from the local road network (Icknield Way).	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Local upgrades may be required to ensure sufficient capacity is available ahead of development.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is located within 50m of the former land use risk zone associated with the agricultural uses adjacent to the site. The site is within the Waste Authority site consultation area for the Tring Sewage works.	
Minerals and Waste Considerations	Site is not located in a Mineral Safeguarding Area.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing, which was confirmed by the Regulation 19 Viability Note (Sep 2024, IDV03.3).	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 39)
This site was not tested in the 2020 sustainability appraisal, as officers considered that this site was not suitable to be carried forward for further detailed testing in PCD05.2 Appendix A.
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)
<p>This site was not progressed as part of any scenario testing.</p> <p>5.4.42: 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) [PCD05.2], 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.</p>
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)
Included in scenario testing and progressed as a variable in scenario 1, 2 and 3. The justification for this is set out in paragraphs 5.4.49 to 5.4.51, although this notes Green Belt, AONB and proximity to the SSSI, and uncertainty regarding SANG provision. This site did not form part of the Council's preferred scenario 7 (7.1.1).

## Summary of Officer Recommendations

2020 Recommendation	Site is not proposed as an allocation
2020 Justification	AECOM considered that this site was sites considered to be suitable for further consideration, however officers did not carry this forward for detailed testing as the site is particularly sensitive in Green Belt terms and may also have an impact on the setting of the AONB. Agricultural land quality is also a significant constraint.

2023 Recommendation	Site is not proposed as an allocation
2023 Justification	Officer recommendation from 2020 is unchanged. The site was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is not proposed as an allocation
2024 Justification	Officer recommendation is unchanged. Officers consider that this site is subject to major constraints including ecology, Green Belt and landscape, and that there are other sites which perform better in relation to their identified constraints, their location in relation to existing facilities and the benefits they can deliver.

## Tring021R | South of Gamnel Farm, Bulbourne Road

Description	The site predominantly consists of agricultural land and bounded to the south by the Bulbourne Road and the built-up area of Tring, and to the north by agricultural land. The sewage treatment works lies just beyond the extended parcel of land to the north west.
Capacity of site	HELAA: 34 Site promoter: 36
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site would be able to deliver a range of house types although it is not of a sufficient scale which would be expected to deliver specialist housing in accordance with policy. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing.	
Social Infrastructure	Site is of a scale that is unlikely to deliver significant new community services and facilities directly, although it can provide public open space. A site of this size is unlikely to result in significant capacity constraints with existing facilities.	
Green Infrastructure	The site will be within the catchment of the Hill Farm Gateway SANG (expected to delivered later in the local plan period) or a SANG delivered with Dunsley Farm. Development would be expected to meet its open space needs on-site (Policy HC5) and contribute towards offsite sport and leisure provision.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have "neighbourhood" landscape value with moderate landscape sensitivity. The HELAA (SSA01.4) identified that c. 9% of the site is located within the Chilterns National Landscape and is likely impact the setting due to its proximity.	
Green Belt Evaluation	<p>The Stage 2 Green Belt Study (2016) identifies the site forms part of the larger parcel (TR-A1) which is considered to contribute strongly to the purposes of the Green Belt. This site is much smaller than the parcel, and so it could be concluded that its contribution to the purposes of the Green Belt would be less than stated in the study, although the wider parcel was recommended to be excluded from any further assessment due to its constraints and contribution to the purposes.</p> <p>The strategic parcel makes a significant contribution to purpose 3, safeguarding the countryside from encroachment, in particular sub-area TR-A1, largely consisting of open fields and woodland. Just 4% of the parcel is covered by development and neither the openness nor character of the parcel are overly affected thereby.</p>	
Flooding	On this site there is a risk of groundwater flooding to both surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally.	
Environmental	According to the 2024 HELAA Update (SSA01.1), the site is located within 500m of the Tring Reservoirs SSSI. The site is within 362 metres of Tring	



	<p>Reservoirs Nature Reserve. 100% of the site is within agricultural land classification grade 3. The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation.</p> <p>There are no other identified ecological constraints associated with this site.</p>	
Historic Environment	The site does not have any identified heritage constraints.	
Highways Impact	Development of this site would likely result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network, particularly when compared to alternatives in the area.	
Sustainable Transport	Site is within walking distance to a range of bus services providing for the local area which are however, infrequent. Site is distant from frequent bus services to Watford and Aylesbury. Development of this site in isolation is unlikely to deliver enhancements to the public transport network in the area.	
Access	Site has existing access from Tringford Road, however this is currently considered inadequate for the purposes of development of this site. Site is accessible to local facilities.	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Local upgrades may be required to ensure sufficient capacity is available ahead of development.</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	<p>According to the 2024 HELAA Update (SSA01.1), Heygates Grain is located approximately 50m south-west of the site, which may be a potential source of contamination. The site is within the Waste Authority site consultation area for the Tring Sewage works.</p> <p>The site is underlain by a Principal Aquifer associated with the Holywell Nodular Chalk Formation and New Pit Chalk Formation and therefore consideration should be given to Controlled Waters as a receptor to any potential ground contamination.</p>	
Minerals and Waste Considerations	Site is not located in a Mineral Safeguarding Area.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing, which was confirmed by the Regulation 19 Viability Note (Sep 2024, IDV03.3).	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 39)

SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
X	-	-	X ✓	X ✓	X	-	-	X	✓	✓	✓	✓	✓	✓

Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan\_ Interim SA Report – Oct 2023 (CD04.1)

This site was not considered as part of any reasonable alternative scenarios.

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 Gamnel 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.

Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)

Included in scenario testing and progressed as a variable in scenario 1, 2 and 3. The justification for this is set out in paragraph 5.4.52, although this notes AONB, proximity to the SSSI, and access constraints. This site did not form part of the Council's preferred scenario 7 (7.1.1).

## Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B83)	Site is not proposed as an allocation.
2020 Justification (PCD05.3, pg. B83)	Site performs reasonably well with respect to a number of identified criteria. Parts of the site are exposed to wider views however officers consider that these impacts are much smaller when compared to alternative sites and can be appropriately mitigated. The site is unlikely to deliver any substantial infrastructure to serve both existing and new communities and would only make a limited contribution towards meeting future housing needs, when compared against alternatives elsewhere in Tring. Having regard to the potential to deliver housing in the short term, officers consider that there are more suitable sites elsewhere which will help to deliver the strategy of the Local Plan.

2023 Recommendation	Site is not proposed as an allocation
2023 Justification	Officer recommendation from 2020 is unchanged. The site was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is not proposed as an allocation
---------------------	---------------------------------------

2024 Justification	Officer recommendation is unchanged. Officers consider that this site is subject to major constraints including ecology, Green Belt and landscape, and that there are sites which perform better in relation to their identified constraints and the benefits they can deliver.
--------------------	---

Description:	Site predominantly consist of agricultural land and is bounded to the south, west and north by the existing built-up area of Tring, Grove Road and Bulbourne Road and to the east by agricultural land (site Tring018R East of Tring)
Capacity of site	HELAA: 367 Site promoter: 400
HELAA conclusion	Deliverable: The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including provision for older people and self/custom build. Viability evidence suggests that this site would be able to deliver policy compliant levels of affordable housing.	
Social Infrastructure	The site is of a scale that could deliver additional small scale community facilities for Tring on site if developed in isolation. If the site is developed as part of a larger urban extension to the east of Tring it is more likely to contribute towards new facilities on the adjacent site. Whilst the site is a sufficient size to deliver education infrastructure this would reduce its overall capacity to deliver residential significantly.	
Green Infrastructure	The site is not promoting its own SANG solution on or off site. It will be within the catchment of Hill Farm Gateway SAND (expected to be delivered later in the local plan period) or a SANG delivered for Dunsley Farm. Adjacent site East of Tring is promoting a 27 ha SANG. Development would be expected to meet its open space needs on-site (Policy HC5) and sport and leisure provision.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have "neighbourhood" landscape value with moderate landscape sensitivity. The HELAA 2024 (SSA01.4) identified that the site may impact the setting of the Chilterns National Landscape due to its proximity.	
Green Belt Evaluation	<p>The Stage 2 Green Belt Study (2016) identifies the site forms part of the larger parcel (TR-A2) which is considered to contribute strongly to the purposes of the Green Belt. This site is much smaller than the parcel, and so it could be concluded that its contribution to the purposes of the Green Belt would be less than stated in the study.</p> <p>The strategic parcel GB04 makes a significant contribution to purposes 2 and 3, preventing merging of Tring and Berkhamsted and safeguarding the countryside from encroachment. However, sub-area TR-A2 does not form part of this strategic gap and appears to make no discernible contribution to the gaps between any non-Green Belt settlements. Just 2% of the parcel is covered by development and, overall, the subarea retains an unspoilt rural character.</p> <p>The Stage 3 Green Belt Study (2020) recommended strengthening if the site should be removed from the Green Belt.</p>	
Flooding	Site is wholly within Flood Zone 1. 5% of the site has a low risk of surface water flooding, 2% medium risk, and 3% high [CSN04.2]. Risks are	

	situated in the central area of the site and are likely to be mitigated through more detailed analysis at the planning application stage. This site has a risk of groundwater flooding to both surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally.	
Environmental	According to the 2024 HELAA Update (SSA01.1), the site is located within 800m of the Tring Reservoirs SSSI. 66% of the site is within agricultural land classification grade 3. The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation. There are no other identified ecological constraints associated with this site.	
Historic Environment	The site does not have any identified heritage constraints.	
Highways Impact	Development is likely to have an impact on the local road network at peak periods, including Bulbourne Road, and Grove Road and routes through to the A41 junction, including Station Road, Cow Lane and London Road. Improvements would likely be required to important junctions in the area, in particular the junction of Station Road with Grove Road and Cow Lane. The site could also make a positive contribution to new/enhanced sustainable transport connections with the existing town and to Tring Station.	
Sustainable Transport	Site is within walking distance to a wide range of bus services to the local area and surrounding area. The more frequent services being to Tring, and Aylesbury. Site is also distant to frequent bus services to other major settlements such as Berkhamsted, Watford and Hemel Hempstead. Development of this site could contribute towards public transport enhancements in the local and wider area.	
Access	Existing access is available from Grove Road although the location of the access may need to be revised to ensure it meets current highway safety standards. Access is also likely to be made available onto Bulbourne Road. Further linkages could be provided through the adjacent Site 124 – East of Tring.	
Water and Wastewater	There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations may be required.  Thames Water have confirmed through their May 2024 Representations to the Infrastructure Delivery Plan (IDV01.1) that based on the information available they do not envisage infrastructure concerns regarding the capacity or capability of the wastewater network or wastewater treatment infrastructure in relation to this site.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	No environmental health issues have been identified. The identification of 'heaps' in previous site assessment work are not considered an issue.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be	

	<p>viable and able to deliver policy compliant levels of affordable housing, which was confirmed by site specific viability testing within the Regulation 19 Viability Note (Sep 2024, IDV03.3).</p> <p>The site is currently reliant on the delivery of a third party SANG solution on another site within its catchment, therefore the trajectory of this site should be aligned with those.</p>	
--	--	--

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 39)																
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change		SA5 Air quality		SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	?	x	✓	x	?	x	-	-	x	✓	✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)																
Included as a variable allocation within the scenario testing (justification set out on page 30, paragraph 5.4.49). This was tested as part of scenario 1, 3, 5, 7, 9, 11 and 12. Within section 7 of the document officers selected scenario 4 as the preferred option (7.1.1) and specifically noted that “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”, and “The Council is equally unable to identify a Council-led Strategic SANG at key locations such as Berkhamsted and Tring”.																
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)																
Included in scenario testing and progressed as a constant. The justification for this is set out in paragraph 5.4.53. This site formed part of the Council’s preferred scenario 7 (7.1.1).																

## Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B85)	Site is proposed for an allocation of around 400 dwellings, including the provision of open space to serve existing and future needs, and high quality sustainable transport linkages which connect with Site 124 – East of Tring and to the Train Station.
2020 Justification (PCD05.3, pg. B85)	The site performs well against a number of identified criteria, and is considered a logical extension to the settlement of Tring. The site forms part of the setting of the Chilterns AONB which gives rise to additional landscape sensitivities, however the allocation of the land to the east reduces this impact. Highways Impacts on Grove Road are a constraint and it is likely that development of this site would deliver junction improvements with Station Road and with Wingrave Road. The constraints need to be considered against the site’s potential to deliver high quality links, new public open space and green corridors with the wider area, delivering safe routes for people to walk and cycle to the town centre, key areas of employment, the train station and the new community hub on adjacent land. Having regard to this, officers recommend the site is allocated to meet the strategy of the new Local Plan. Spatially, the site’s relationship with the adjacent site East of Tring is critical to ensuring the sustainable movement of people through the settlement and it is

	important that this opportunity is maximised to ensure the Tring place strategy is delivered.
--	---

2023 Recommendation (PCD01.1, page 16)	Deleted as an allocation
2023 Justification	The site was deleted as a draft allocation on the basis that it was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5)

2024 Recommendation	Site is proposed for an allocation of around 400 dwellings
2024 Justification	<p>The site relates well to the settlement edge and is subject to limited constraints. The allocation of this site alongside the East of Tring (Tr03) allocation represents a more logical and comprehensive extension to the town on land between Bulbourne Road and Station Road, enabling greater opportunities for integration with existing communities and delivering new and enhanced links with Tring Station. While the site does not have its own SANG solution, it can benefit from two third party SANG solutions (surplus SANG capacity at Tr01 – Dunsley Farm or Tr03 – East of Tring).</p> <p>Having regard to alternatives, whilst the wider assessment parcel was assessed as contributing strongly to the purposes of the Green Belt, the Green Belt Stage 2 assessment recommended that the sub-area broadly corresponding with the proposed extent of this site would not compromise the ability of the wider Green Belt to meet its purposes and should be considered further.</p>

#### Pre-Submission considerations:

**Wastewater:** the Regulation 20 representation from Thames Water stated that no concerns have been raised in relation to this site.

It is noted that water supply was highlighted as red in the water assessment RAG, it is considered that this reflects the position set out in 2020.

**Green Infrastructure:** The site promoter of Dunsley Farm has confirmed that they are unable to fully commit to James Farm as SANG but will continue to engage with all the relevant stakeholders to complete this assessment as soon as possible. Officers note that alternative provision could also be made at Cow Lane Farm Meadows wildlife site and New Mill would be within the catchment of this, alternatively within catchment of the SANG provided on-site at Land East of Tring.



## Bov008R | Duckhall Farm

Description	Predominantly agricultural land bounded to the south by the built-up area of Bovingdon, to the west by Bovingdon Airfield and HMP The Mount, and to the northeast by agricultural land.
Capacity of site	HELAA: 82 (excluding 8 ha of land promoted for on-site SANG) Site promoter: 60-70
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including housing for older people (as suggested within the representation by the site promoter in 2023) and potentially some self/custom build, although this is subject to the overall mix of houses and flats proposed.	
Social Infrastructure	The site is of a scale that is unlikely to deliver new social infrastructure on-site. The capacity of the primary school in the village is a local constraint to development (CD01.1, 5.2.45). In 2023 HCC noted Bovingdon could accommodate c.150-200 homes, and officers note that planning permission for 217 homes (including C2) was granted at Bov010R in September 2024. The existing school has no expansion potential.	
Green Infrastructure	<p>Within the site promoter representations to the Revised Strategy for Growth (2023, RSG_461), a SANG of around 8 ha was promoted on site, however officers consider that this is unlikely to meet the minimum SANG criteria as the 2.3km walk can only be achieved using off-site connections and a "zigzag" route resulting in narrow strips where screening would be required. The site is within the catchment of an established SANG at Westbrook Hay.</p> <p>Officers consider the land proposed for SANG in 2023 could deliver enhanced public green space, meaning the site is likely to meet its open space needs in full, and this could potentially contribute towards deficiencies within the settlement. The site would be expected to contribute towards offsite sport and leisure provision.</p>	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have moderate landscape sensitivity. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape.	
Green Belt Evaluation	The Stage 2 Green Belt Study 2016 (CSN08.1) identifies the site forms part of a larger parcel (BV-A2) which is considered to contribute strongly to the purposes of the Green Belt. The site is much smaller than the parcel assessed and therefore it could be concluded that its contribution to the purposes of the Green Belt would be less than that stated in the study. The Stage 3 Green Belt Study 2020 (CSN09.2) noted the site has a weak boundary to the northeast and northwest and recommended boundary strengthening if this site were to be released.	
Flooding	The site is wholly within Flood Zone 1. The HELAA identified that 21% of the site is at low risk of surface water flooding and 2% at medium risk,	

	however this is within areas that are not proposed for residential development (as per RSG_461).	
Environmental	The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation. The 2024 HELAA Update (SSA01.1) identified no other ecological constraints associated with this site.	
Historic Environment	There are four grade II listed buildings, located either side of the access point in the western part of the site, and as per the conclusion within PCD05.3 (page B28-29) officers consider that identified impacts can be sufficiently mitigated, although this is likely to reduce the development potential of this site.	
Highways Impact	Development of this site would likely result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network, when compared to alternatives.	
Sustainable Transport	The site is within walking distance to good quality public transport connections to major towns in the area such as the hourly bus services of the 105/352 to Hemel Hempstead, the 105 to Uxbridge/Amersham and the 352 to Watford. Development of this site in isolation would unlikely result in enhancements to the public transport network at Bovingdon. The site is located closely to existing services and facilities on Bovingdon High Street.	
Access	Site is accessible from the local road network (Newhouse Road) and has good access to local facilities and public transport as mentioned above. Alternative access may be achievable onto Hempstead Road via land in the same ownership.	
Water and Wastewater	Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations may be required.  Wastewater: No infrastructure concerns as a result of development of this site.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the HELAA Update 2024 (SSA01.1), the site is located within 50m of the former land use risk zones associated with the garage and Bovingdon airfield military land. The site is underlain by a Principal Aquifer, 100% of the site is located within Source Protection Zone 3. In addition, the site is located within a radon affected area.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	Viability evidence suggests that greenfield sites in this location should be able to deliver policy compliant levels of affordable housing. The site has been recently promoted for the proposed use as a deliverable site; however, further certainty would be required on the provision and acceptability of the proposed SANG solution and the impacts of identified constraints on the overall capacity of the site.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 39)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	?	✓	✓	x	?	?	x	✓	✓	x	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
This site was not progressed as part of any scenario testing.														
5.4.73: 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.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
Included in scenario testing and progressed as a variable in scenario 1, 2, 3, 4, 5, 6 and 10. The justification for this is set out in paragraph 5.4.64, although this notes Green Belt and heritage constraints. This site did not form part of the Council's preferred scenario 7 (7.1.1).														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B29)	Site is not proposed as an allocation.
2020 Justification (PCD05.3, pg. B29)	Site performs well on a number of identified constraints, many of which are likely to be sufficiently mitigated through development, however careful consideration is needed to ensure that development does not impact upon the setting of Honours Farm (a listed building with open views into the site) and other heritage assets in close proximity to the site. On this basis and having regard to alternative sites in Bovingdon, officers consider there are other sites that are less constrained and offer more sustainability benefits, and therefore do not recommend the site is allocated to deliver the strategy of the new Local Plan.
2023 Recommendation	Site is not proposed as an allocation.
2023 Justification	Officer recommendation from 2020 is unchanged. While the site was within catchment of a Council-led SANG solution, the Council's SANG allocation policy (CSN01.1) requires green belt sites to identify their own solution as existing Council-led SANG capacity was limited. The site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is not proposed as an allocation.
2024 Justification	Officer recommendation is unchanged. It is unlikely that the proposed on-site SANG would meet the relevant criteria and the grant of planning permission at Grange Farm results in significant constraints to primary education capacity.

## Bov010R | Grange Farm

Description:	The site consists predominantly of agricultural land, with the built up area of Bovingdon to the northeast, small scale commercial units to the southeast, Bovingdon Brickworks wildlife site to the southwest and Bovingdon Airfield to the northwest.
Capacity of site	HELAA: 248 Site promoter: 217
HELAA conclusion	Deliverable: The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types including housing for older people. The site area previously included some small-scale commercial units however these have been excluded from the site boundary.	
Social Infrastructure	Officers considered that the site is of a scale that could deliver additional community facilities for Bovingdon, including safeguarded land to deliver a new primary school should feasibility work undertaken by the education authority determine that this is required. The planning application submitted (23/02034/MFA) did not include safeguarded land for a primary school and included land for a community building and sports and recreation. The education authority responded to this application confirming that capacity issues still exist in the village.	
Green Infrastructure	The site is within the catchment of an established SANG solution at Haresfoot Farm which is fully within the control of the site promoter. Development is expected to deliver around 1.15ha of land for outdoor sport provision on site alongside public open space including community food growing areas.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have moderate landscape sensitivity. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of parcel BK-A6, which is considered to make the weakest to the purposes of the Green Belt. The Stage 3 Green Belt Study (2020) recommended strengthening of the eastern boundary however officers consider the revised green belt boundary as set out in CD01.1 addresses concerns raised within this study, as Meadow Drive and the adjacent hedgerow is readily recognisable and likely to be permanent.	
Flooding	Site is wholly within Flood Zone 1. 28% of the site is at low risk of surface water flooding, 5% medium risk and 3% high risk [CSN03.12].	
Environmental	According to the 2024 HELAA Update (SSA01.1), some TPOs exist along the north-eastern boundary of the site. These are likely to be retained through any development of the site. The site is also adjacent to the Bovingdon Brickworks Local Wildlife Site to the west. The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation. There are no other identified ecological constraints associated with this site. The HELAA identified that	

	c.80% of the site is within agricultural land classification grade 2 (BMV), however the detailed soil survey undertaken to inform the outline planning application confirmed that the site is 80% grade 3b and 20% non-agricultural.	
Historic Environment	There is one grade II listed building within 100m of the site located at the western corner. This is currently well screened by mature boundary trees on the edge of the site.	
Highways Impact	Development is likely to have an impact on the local road network at peak periods, including Chesham Road, Green Lane and the B4505. Enhancements to B33 Site Selection: Appendix B the road network would likely be required, including enhancements to the Leyhill Road Junction.	
Sustainable Transport	The proposed access is 100m from existing bus stops on Green Lane served by the frequent 1/1B service to High Wycombe (via Chesham and Amersham) and Hemel Hempstead town centre (via Hemel Station) and is within reasonable proximity to stops served by less frequent services 51 to Chipperfield and 352 to Watford. Improvements to the bus stops have been secured as part of the granted planning application, alongside improvements to footways and cycle routes.	
Access	Site is accessible from the local road network (B4505/Chesham Road and Green Lane). Reasonable access to local facilities and good access to public transport although services are limited.	
Water and Wastewater	Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.  Wastewater: (CD10.5, Comment ID RSG_673) Thames Water did not envisage infrastructure concerns regarding the wastewater network or wastewater treatment infrastructure capability in relation to this site, although they noted that care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding due to high groundwater levels. This was confirmed within their responses to consultations on the pre-submission version of the Local Plan, informing IDV01.1 and IDV02.1.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is underlain by a Principal Aquifer and is located within Source Protection Zone 3. A historic landfill and motors services and repairs garage are located to the west of the site and could be a potential source of contamination. Officers consider the risk of contamination to be low.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site. The site is located within the Brick Clay Mineral Safeguarding Area and the Minerals Planning Authority advised the site is located closely to a previous extraction site for brick clay.	

Viability and deliverability	<p>The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing, which was confirmed by site-specific viability testing in 2024 through the Regulation 19 Viability Note (Sep 2024, IDV03.3).</p> <p>A hybrid planning application was granted on the 24<sup>th</sup> September 2024. This granted full planning permission for 57 dwellings and 59 C2 extra care units and all means of access, and outline planning permission for 129 dwellings, 1.15ha of community land for outdoor sport and recreation and construction of community buildings (Use Class F) including provision of scouts hut, community orchard, gardens, green space, landscaping and all other associated works and infrastructure.</p>	
------------------------------	---	--

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 39)														
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	?	✓	✓	xx	?	?	x	✓	✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)														
This site was included in scenario testing as a constant (as justified within paragraphs 5.4.70-5.4.72).														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
This site was included in scenario testing as a constant, as justified within paragraph 5.4.62, noting the site had planning permission for 217 homes.														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B33)	Site is proposed for an allocation of around 150 dwellings with public open space, and sufficient land should be safeguarded for a new three form-entry primary school.
2020 Justification (PCD05.3, pg. B33)	Site performs well on a number of identified constraints, many of which are likely to be sufficiently mitigated through development. Development of the site would assist in the delivery of new drainage infrastructure that would address known surface water flooding issues for existing communities in the area. This will be implemented as part of a new public park which to serve the wider village. Having regard to the above and other alternative sites in Bovingdon, on balance officers consider that Grange Farm is the most sustainable option, bringing a number of benefits for Bovingdon as well as meeting the wider strategy of the Local Plan. Officers therefore recommend its allocation in the new Local Plan.

2023 Recommendation	Site is proposed for an allocation of around 150 dwellings with public open space, and sufficient land should be safeguarded for a new three form-entry primary school.
2023 Justification	The site was recommended as a draft allocation broadly in line with officer recommendations in 2020. The site was supported by a bespoke third party SANG solution at Haresfoot Farm. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).

2024 Recommendation	Site is proposed for an allocation of around 150 dwellings
2024 Justification	This site now has planning permission and will deliver 1.15ha of land safeguarded for community uses. A key issue is confirming the implications for school capacity within the village.

**Pre-Submission considerations:** Reserved matters application (24/02942/RES) for 'Phase 2' received on 24/12/2024. On-site work for phase 1 commenced.

**Matters to note following submission:** Reserved matters granted on 31/03/2024, which means the whole site benefits from full planning permission. The site is now under construction. If the housing trajectory and table 1 of H1 is required to be updated through main modifications this site would form part of the commitments for Bovingdon and officers have recommended that policy Bv01 is no longer necessary.



Description:	Site consists of agricultural land and is bounded on the northwest and northeast by the existing built-up area of Bovingdon, to the southeast and southwest by agricultural land (including site Fox Meadow)
Capacity of site	HELAA: 127 Site promoter: 130
HELAA conclusion	Deliverable: The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.

Housing & Economy	The site is of a scale which would be able to deliver a range of house types, including housing for older people and self/custom build.	
Social Infrastructure	<p>The site is of a scale that could deliver and contribute towards additional community facilities for Bovingdon, although it is unlikely to directly deliver significant social infrastructure, such as health or education facilities, on site.</p> <p>The site is a sufficient size to deliver a primary school; however, this is unlikely to be suitable due to the impacts on the local road network. This would also significantly reduce the site's capacity for residential.</p> <p>The capacity of the primary school in the village is a local constraint to development (CD01.1, 5.2.45). In 2023 HCC noted Bovingdon could accommodate c.150-200 homes, and officers note that planning permission for 217 homes (including C2) was granted at Bov010R in 2024. The existing school has no expansion potential.</p>	
Green Infrastructure	The site is within the catchment of an established SANG solution at Haresfoot Farm which is fully within the control of the site promoter, however capacity may be limited due to its allocation for other sites. This site would be expected to provide other open space typologies and play space onsite and contribute towards offsite sport and leisure provision.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have low landscape sensitivity. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape.	
Green Belt Evaluation	<p>The Stage 2 Green Belt Study (2016) identifies the site forms part of parcel (Parcels D-SS2) which is considered to make the weakest contribution to the purposes of the Green Belt.</p> <p>The Stage 3 Green Belt Study (2020) recommended boundary strengthening if the site should be removed from the Green Belt.</p>	
Flooding	A small area (5%) is at a low risk of surface water flooding. Overall, the site has a low flood risk from all sources.	
Environmental	According to the 2024 HELAA Update (SSA01.1), 24.57% of the site is within agricultural land classification grade 2 and 75.43% of the site is within agricultural land classification grade 3. The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods	

	Special Area of Conservation. There are no other identified ecological or environmental constraints associated with this site.	
Historic Environment	The site does not have any identified heritage constraints.	
Highways Impact	Development is likely to have an impact on the local road network at peak periods, including, Green Lane, High Street and Chipperfield Road. Enhancements to the road network would likely be required, including enhancements to the Green Lane / Chipperfield Road Junction. Green Lane experiences high levels of on street parking which is known to impede the flow of traffic at peak periods.	
Sustainable Transport	The site is within walking distance to an existing bus stop served by the frequent 1/1B service to High Wycombe (via Chesham and Amersham) and Hemel Hempstead town centre (via Hemel Station) and the less frequent 51 to Chipperfield and is within reasonable proximity to stops on the High Street served by the 352 service to Watford.	
Access	Site is accessible from the local road network via Homefield. The site promoter has confirmed that a secondary access point from Yew Tree Drive could serve as an emergency access if required. Enhancements to Homefield should deliver safe pedestrian and vehicular access. Further linkages could be provided through the adjacent at Fox Meadow.	
Water and Wastewater	Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.  Wastewater: Local upgrades may be required to ensure sufficient capacity is available ahead of development.	
Other Utilities	No major power lines/pylons or gas pipelines traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	According to the 2024 HELAA Update (SSA01.1), the site is underlain by a Principal Aquifer and 100% of the site is located within Source Protection Zone 3.	
Minerals and Waste Considerations	The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing, which was confirmed in 2024 through the Regulation 19 Viability Note (Sep 2024, IDV03.3).	

SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	-	✓	✓	x	?	-	x	✓	✓	✓	✓	✓	✓

#### Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan\_ Interim SA Report – Oct 2023 (CD04.1)

This site was not progressed as part of any scenario testing.

5.4.73: 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.

#### Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)

Included in scenario testing and progressed as a variable in scenario 1, 2, 3, 4, 5, 6 and 10. The justification for this is set out in paragraph 5.4.64, although this notes school capacity, access and green belt constraints. This site did not form part of the Council's preferred scenario 7 (7.1.1).

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3, pg. B35)	Site is not proposed as an allocation
2020 Justification (PCD05.3, pg. B35)	Site performs well on a number of identified constraints, many of which are likely to be sufficiently mitigated through development. While there is expected to be no technical issue to delivering access onto Green Lane, issues currently exist with on-street parking which give rise to highway safety issues and it is unclear how this could be effectively managed to ensure appropriate sight lines are achieved in addition to enhancing traffic flows at peak periods. On this basis and having regard to alternative sites in Bovingdon, officers consider there are other sites that are less constrained and offer more sustainability benefits than this site, and therefore do not recommend the site is allocated to deliver the strategy of the new Local Plan.

2023 Recommendation	Site is not proposed as an allocation
2023 Justification	Officer recommendation from 2020 is unchanged. While the site was within catchment of a Council-led SANG solution, the Council's SANG allocation policy (CSN01.1) requires green belt sites to identify their own solution as existing Council-led SANG capacity was limited. The site promoters did not have a bespoke SANG solution at the time (there was insufficient capacity at Haresfoot Farm SANG to serve this site alongside others). This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5). Officers also note the capacity constraints with regards to primary school provision in this area remain subject to feasibility.

2024 Recommendation	Site is not proposed as an allocation
2024 Justification	<p>Officer recommendation is unchanged. It is unclear if the Haresfoot Farm SANG has sufficient capacity to accommodate the development, and the grant of planning permission at Grange Farm results in significant constraints to primary education capacity.</p> <p>Having regard to alternative sites, whilst it is recognised that Bov014R makes the weakest contribution to the purposes of the Green Belt, the capacity of the primary school in the village is a local constraint to development (CD01.1, 5.2.45).</p> <p>In 2023 HCC noted Bovingdon could accommodate c.150-200 homes, and officers note that planning permission for 217 homes (including C2 provision for older people) was granted at Bov010R Grange Farm in 2024.</p> <p>As the existing school has no expansion potential and this site is not a sufficient scale to deliver its own solution, this site cannot be considered as suitable.</p>

Description:	Site predominantly consists of agricultural land and is bounded to the south by the existing built-up area of Kings Langley, to the east by Kings Langley Secondary School, to the west by the A41 and to the north by agricultural land.
Capacity of site	HELAA: 235 Site promoter: 150
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	The scale of the site is large enough to support full range of housing types highlighted as needed through the LHNA (HOU01.1) from 1 bed to 4+ bed, as well as specialist housing and self/custom build in accordance with proposed policy thresholds.	
Social Infrastructure	CD03.1 (paragraph 5.4.57) stated that primary school capacity is a significant local issue in Kings Langley, particularly following the grant of planning permission at Rectory Farm (KL02 – PCD02.1). This is based on a response from Hertfordshire County Council to the consultation informing IDV01.1. CD03.1 also considered that a new primary school at Hemel117R is unlikely to practically support the new sites identified within the growth proposals at Kings Langley, in line with the response from HCC. The site is not of a scale sufficient to support a new primary school on site.	
Green Infrastructure	The site is not promoting its own SANG solution on or off site, although the development is within the catchment of SANGs serving the settlement. It is noted that Policy NE5 (CD01.1) requires developments of one hundred homes or more to seek their own SANG solution. Development would be expected to meet its open space needs on-site (Policy HC5) and contribute towards offsite sport and leisure provision.	
Landscape	In the 2020 Landscape Sensitivity Study Draft Report (CSN10.1), the overall site is considered to have low-moderate landscape sensitivity. The HELAA 2024 (SSA01.4) did not identify any potential impact on the setting of the Chilterns National Landscape.	
Green Belt Evaluation	The Stage 2 Green Belt Study (2016) identifies the site forms part of a larger parcel (Parcel KL-A3) which is considered to make the least contribution to the purposes of the Green Belt. The Stage 3 Green Belt Study (2020) recommended strengthening if the site should be removed from the Green Belt as there is a weak norther boundary (also noted within paragraph 5.4.57 of the 2024 Sustainability Appraisal CD03.1).	
Flooding	The site is at low risk of flooding from all sources and is wholly within Flood Zone 1. 11% of the site is at low risk of surface water flooding, 4% medium risk and 2% high risk (CSN03.12).	
Environmental	The site is located within the 12.6km Zone of Influence surrounding the Chilterns Beechwoods Special Area of Conservation. There are no other identified ecological or environmental constraints associated with this site (SSA01.4).	

Historic Environment	There are two Grade II listed buildings within 100m of the site located to the southeast. The site is located within 100m of the Kings Langley conservation area. It is likely that impacts can be sufficiently mitigated through careful design and masterplanning of the site.	
Highways Impact	<p>Development would likely result in an increase in traffic to and from the site in peak hours, which would likely have an impact on the local road network, including Love Lane, Chipperfield Road, Vicarage Lane and Hempstead Road.</p> <p>Paragraph 5.4.57 of the 2024 Sustainability Appraisal (CD03.1) noted that schools in this western sector of the village add to traffic issues, and that there is also a wider concern regarding traffic along the A4251 and regarding capacity of M25 Junction 20 in combination with growth elsewhere, including in Three Rivers.</p>	
Sustainable Transport	<p>Site is within walking distance to the 500 bus services to Aylesbury and Watford, with a frequency of every 15-30 minutes. Development of this site could contribute towards public transport enhancements in the area. The site is adjacent to Kings Langley Secondary School and is within walking/cycle distance of Kings Langley High Street.</p> <p>There are opportunities to provide new/enhanced sustainable transport linkages with the existing High Street. It is noted that the rail station is distant and to reach the village centre, and that there are constraints due to the steepness of the hill.</p>	
Access	Site has an existing access from Love Lane, although the access would likely need to be enhanced/widened to allow for the scale of growth promoted. Alternative access has also been identified through residential properties on Chipperfield Road. This is likely to be achievable.	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Thames Water raised no infrastructure concerns because of development of this site through their representations in May 2024 to the Infrastructure Delivery Plan (IDV01.1).</p>	
Other Utilities	<p>No major power lines/pylons or gas pipelines traverse the site.</p> <p>No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.</p>	
Environmental Health	<p>According to the 2024 HELAA Update (SSA01.1), 100% of the site is located within Source Protection Zone 3.</p> <p>The site is underlain by a Principal Aquifer associated with the Lewes Nodular Chalk Formation and Seaford Chalk Formation and therefore consideration should be given to Controlled Waters as a receptor to potential ground contamination. In addition, the site is located within the Hertfordshire Mineral Consultation Area for sand and gravel resources. Furthermore, a historic landfill is located within 50 and 250m west of the</p>	

	site, considered to be a potential source of contamination with the potential to impact the site.	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. The site is located within the Brick Clay Mineral Safeguarding Area.	
Viability and deliverability	The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing.	

Emerging Strategy for Growth Interim Sustainability Appraisal Report - Nov 2020 (CD05.1 Page 39)																	
SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change		SA5 Air quality		SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing		SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	?	-	x	✓	x	✓	x	?	?	x	✓	x	✓	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1)																	
Not tested as part of reasonable alternatives due to road access and traffic constraints, no SANG solution and education capacity constraints in the settlement (5.4.61-5.4.63).																	
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)																	
Included in scenario testing and progressed as a variable in scenario 1, 2, 3, 4, 5, 6 and 10. The justification for this is set out in paragraph 5.4.57, although this notes school capacity and traffic constraints. This site did not form part of the Council’s preferred scenario 7 (7.1.1).																	

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3 pg.59)	Site is not proposed as an allocation.
2020 Justification (PCD05.3 pg. B59-60)	Site performs well on a number of identified criteria, with the majority of identified constraints likely to be sufficiently mitigated alongside development. Access was initially identified in the AECOM Site Assessment Study as a constraint although an alternative proposal has been identified which overcomes this constraint. The site relates well to existing facilities such as primary and secondary education, but is distant from the main high street/A4251 and the train station, relative to other alternatives in the area. Officers consider that, on balance, there are more suitable sites in the area which can better deliver the strategy of the Local Plan.
2023 Recommendation	Site is not proposed as an allocation.
2023 Justification	Officer recommendation from 2020 is unchanged. While the site was within catchment of a Council-led SANG solution, the Council's SANG allocation policy (CSN01.1) requires green belt sites to identify their own solution as existing Council-led SANG capacity is limited. The site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG



	Mitigation Strategy (CSN01.1 - Section 3.5). Officers also raise concerns from the education authority with regards to capacity.
--	--

2024 Recommendation	Site is not proposed as an allocation.
2024 Justification	<p>The officer recommendation from 2023 is unchanged.</p> <p>Whilst it was confirmed in 2023 that the site is located within the catchment area of a third party SANG solution (which is now established), officers recognise that the capacity of the education infrastructure within the village of Kings Langley restricts growth within this settlement.</p> <p>Whilst the Sustainability Appraisal sets out a strategic case for small scale growth within the large villages, officers consider that the grant of planning permission at 'Rectory Farm' (draft allocation KL02, PCD02.1) for 135 residential units (application reference 22/01836/MFA, appeal reference 23/3333545) will provide this.</p>

#### **Pre-Submission considerations:**

**Social Infrastructure / Viability and Deliverability:** A planning application was submitted on the 22<sup>nd</sup> January for this site under the reference 25/00143/MOA for up to 150 residential dwellings including affordable housing (Use Class C3), new vehicular access off Chipperfield Road, new pedestrian and cycle access at Love Lane, new education facility and community building (F1(a)/sui generis use), landscaping, public open space and play space, cycle and car parking, and associated infrastructure. All matters reserved excluding Chipperfield Road and Love Lane access.

On the 18<sup>th</sup> February 2025 Hertfordshire County Council responded stating: *"It is considered that there is not sufficient education capacity in the local area to accommodate the proposed development nor is there an appropriate solution to education capacity, at the primary phase, to mitigate the development and therefore the county council are unsupportive of further development in Kings Langley outside of that which is outlined in the draft Local Plan [CD01.1] and wish to object to this development unless an education solution can be identified and delivered"*.

**Post-Submission Considerations:** The site now has a resolution to grant planning permission subject to S106.

Description	Parcel of agricultural land which adjoins the southeastern corner of the settlement of Markyate, bounded by agricultural land to the east and south, and by the London Road and A5183 to the north. The River Ver crosses through the northern portion of the site.
Capacity of site	HELAA: 154 (1.9% of the site area has been deducted due to the presence of intrinsic constraints on the site) Site promoter: 150
HELAA conclusion	Developable: The site is a suitable location for defined use and there is a reasonable prospect that all or part of the site could become available and viably commence development in years 6-10 or 11- 15 of the period of the Local Plan.

Housing & Economy	<p>The scale of the site is large enough to support full range of housing types highlighted as needed through the LHNA (HOU01.1) from 1 bed to 4+ bed, as well as specialist housing and self/custom build in accordance with proposed policy thresholds. The 2024 Sustainability Appraisal (CD03.1) notes that there is an assumption that the delivery of this site will contribute to locally arising housing needs (paragraph 9.11.3).</p> <p>In the assessment of economic impacts, CD03.1 considered how directing new homes to Markyate was supported due to its links to key employment areas (paragraph 9.8.3).</p>	
Social Infrastructure	<p>The site is unlikely to directly deliver social infrastructure on-site, but delivering new homes at Markyate is supported from a perspective of maintaining the viability of existing services and facilities (CD03.1 pages 39 and 74).</p> <p>The cost of a potential expansion of the primary school has been factored into IDV01.2 although this is not a critical or essential project as the school is currently running at 72% capacity (CD03.1 paragraph 5.4.73). No concerns relating to the capacity of healthcare or other types of community infrastructure were raised by providers, development will likely provide contributions to support these services.</p>	
Green Infrastructure	The site is not promoting its own SANG solution on or off site, however it is within the catchment of the established Studham Common SANG in the Central Bedfordshire council area. The site is expected to meet its requirement for open space on site, including a new area of parkland around the River Ver, and provide contributions towards offsite sport and leisure provision.	
Landscape	The Landscape Sensitivity Study Draft Report (2020, CSN10.1) considered the site to have low-moderate landscape sensitivity.	
Green Belt Evaluation	<p>The Stage 2 Green Belt Study 2016 (CSN08.1) identifies the site forms part of a larger parcel (MY-A3) which is considered to contribute strongly to the purposes of the Green Belt.</p> <p>As part of the assessment undertaken within CSN08.1, a refined sub-area of parcel MY-A3 was assessed as suitable for further consideration, stating that this “does not compromise the ability of the wider Green Belt to meet its purposes” and that “Existing historic hedgerows would</p>	

	<p>provide robust and defensible boundaries for the Green Belt” (page 130). The site broadly corresponds with sub-area of parcel MY-A3.</p> <p>The Stage 3 Green Belt Study 2020 (CSN09.2) recommended boundary strengthening to the south of the site. CD03.1 noted the development of this site offers “good potential to secure a new defensible Green Belt boundary, i.e. with little risk of future development creep either to the east or to the west” (paragraph 5.4.71).</p>	
Flooding	<p>The site is mostly located in flood zone 1 (91%) but includes the River Ver (Flood Zone 2 – 3%, and 3b 6%) and areas of higher risk for groundwater and surface water flooding. Modelled fluvial existing risk and the additional risk from climate change show that it should be possible for this site to pass the exception test if the areas adjacent to the River Ver are left free of development and the existing green corridor kept in place (CSN04.2).</p> <p>Necessary infrastructure in the form of a single-span bridge is needed to enable development, however the L2 SFRA determined that safe access and escape routes should be possible via London Road (CSN04.2).</p> <p>The site has been subject to, and passed the exception test (CSN13.1, Table 4.1) to site selection.</p>	
Environmental	<p>The River Ver flows through the site and development should protect and enhance the chalk stream priority habitat (SSA01.4, 2024). This is likely to be achieved through the delivery of enhanced open space around the river within the areas of high fluvial flood risk. Hertfordshire County Council ecology confirmed the overall ecological sensitivity of the site is low.</p>	
Historic Environment	<p>The site does not have any identified heritage constraints, although CD03.1 identifies, based on representations by the site promoter, that there is archaeological potential on the site, associated with the nearby roman road. The site promoter confirmed that baseline studies to date have not identified any archaeological constraint, noting that further investigations may be required.</p>	
Highways Impact	<p>Development of this site would result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network.</p>	
Sustainable Transport	<p>The site is in walking distance to the frequent 34 and 46 services to Luton Town Centre and Dunstable. Site is also within walking distance to local infrequent bus services to St Albans, Hemel Hempstead and Harpenden. Markyate does not have a train station, the nearest is Luton which is over 5km away. Development of this site in isolation is unlikely to deliver significant public transport enhancements for the local and wider area.</p> <p>CD03.1 acknowledged that new homes at Markyate will “likely be associated with relatively high levels of car dependency”, but there is also “a transport case to be made for supporting the viability of village services and facilities” (paragraph 9.15.2).</p>	
Access	<p>The site is accessible from the local road network (London Road). The access road for the site would have to cross Flood Zone 2/3. As such it</p>	

	would be subject to a Flood Risk Assessment and Exception Test (SSA01.4 page 445).	
Water and Wastewater	<p>Water: There is sufficient water supply in the region, however reinforcements to the network, including possible new pumping stations are likely to be required.</p> <p>Wastewater: Thames Water raised no infrastructure concerns because of development of this site through their representations in May 2024 to the Infrastructure Delivery Plan (IDV01.1). The site promoter noted within their representations that a sewer runs east to west along the site boundary, however the required easement aligns with the areas of high flood risk where built development will be avoided.</p>	
Other Utilities	No major power lines/pylons or gas pipes traverse the site. No significant issues have been identified with respect to gas or electricity provision for the site, although some reinforcements or enhancements to these networks may be required to accommodate growth.	
Environmental Health	<p>The site is located within 50m of the former land use risk zone associated with the car breakdown depot (SSA01.4) however as any development of the site is likely to be to the south of the River Ver, this is unlikely to be an issue. The site is underlain by a Principal Aquifer and 100% of the site is located within Source Protection Zone 2.</p> <p>The A5183 may be a source of noise pollution, however this is more likely to impact the north of the site where development is positioned away.</p>	
Minerals and Waste Considerations	The site falls outside of the Sand and Gravel Belt. BGS data does not identify any potential sand and gravel deposits beneath the site.	
Viability and deliverability	<p>The Revised Strategy for Growth Local Plan Viability Update (Oct 2023, IDV03.1) concludes that greenfield sites in this location would likely be viable and able to deliver policy compliant levels of affordable housing, which was confirmed by site-specific viability testing in 2024 through the Regulation 19 Viability Note (Sep 2024, IDV03.3).</p> <p>The Sustainability Appraisal notes at paragraph 5.4.72 that the site promoter's consultation response received in 2023 "helpfully presents four alternative options for delivering the site, ranging from a capacity of 110 homes to 150 homes, which gives confidence that the site could be viably delivered (including an access bridge) even if the number of homes needs to be reduced in order to allow more space for green / blue infrastructure".</p> <p>It is also noted within CD03.1 that the site can deliver early in the plan period, including because there is SANG capacity at Studham Common (5.4.73).</p>	

SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
x	✓	?	xx	?	x	-	-	x	✓	x	✓	✓	✓	✓
Revised Strategy for Growth Sustainability Appraisal (SA) of the Dacorum Local Plan_ Interim SA Report – Oct 2023 (CD04.1, pg. 35)														
The site was not included in scenario testing in the ISA as justified by paragraph 5.4.82, largely because of the lack of an identified SANG solution, but also accounting for Green Belt, AONB and flood risk sensitivities.														
Sustainability Appraisal of the Dacorum Local Plan - Oct 2024 (CD03.1)														
The site is considered from paragraphs 5.4.69 to 5.4.76 and is progressed into scenario testing as a constant (figure 5.16). Paragraph 9.17.32 considers that the strategic context is such that there is a clear case for allocating some growth to Markyate over the plan period, and it is very difficult to envisage any other option for growing the village.														

### Summary of Officer Recommendations

2020 Recommendation (PCD05.3 pg. B73)	Site is proposed for an allocation of around 150 dwellings with public open space, subject to masterplanning
2020 Justification (PCD05.3 pg. B73)	<p>The site performs well on a number of criteria, with the majority of identified constraints likely to be mitigated through new development. Part of the site includes the River Ver, which traverse the site and gives rise to a higher risk of flooding on part of the site. Access would also be required to cross the River in order to enable development of the site. Officers have considered the sequential test for flood risk and consider that any new residential development can avoid areas of higher flood risk through effectively policy wording.</p> <p>Exception Test to flood risk: The requirement for a single-span bridge means that the site would need to pass the exception test to site selection. Officers consider that there are no other suitable and available sites in Markyate which are at lower risk of flooding. The adjacent site 105 – Cotton Spring Farm is expected to also require access</p>
2023 Recommendation (PCD01.1, page 27)	Site is recommended to be deleted as an allocation
2023 Justification	The site was deleted as a draft allocation on the basis that it was not within a catchment of a Council-led SANG and the site promoters did not have a bespoke SANG solution at the time. This is in accordance with the SANG Mitigation Strategy (CSN01.1 - Section 3.5).
2024 Recommendation	Site is proposed for an allocation of around 150 dwellings with public open space, subject to masterplanning

2024 Justification	<p>Given the strategic case to allocate some growth in Markyate (CD03.1, paragraph 9.17.32), officers consider this allocation is justified.</p> <p>This site has an area of high flood risk affecting the edge of the site and site access, however both officers contend that the flood risk constraint has been explored in detail through a Level 2 SFRA and that residential development can be sequentially located away from the areas of highest risk.</p> <p>It was confirmed that the site is now within the catchment of an established SANG solution at Studham Common (in principle agreement with Central Bedfordshire Council), which resolved officer concerns arising in 2023 and enables this site to deliver earlier within the period of the Local Plan.</p> <p>The site was recommended for further consideration as part of the Stage 2 Green Belt study, despite being part of a larger parcel which was assessed to strongly contribute to its purposes. The site also has a low level of landscape, heritage and ecological constraint.</p> <p>Development of this site can be accommodated by the existing infrastructure of the village and can contribute towards supporting the future viability of local services. The site is also expected to address locally arising housing needs including c. 60 affordable homes.</p>
--------------------	---

#### Pre-Submission considerations:

**Flood Risk:** CSN13.1 Sequential and Exception Tests Summary Report (Mar 2025) summarises that the exception test has been passed for this site, as it will be possible to minimise flood risk though keeping the area within Flood Zones 2 and 3 free of any built development, except for the main access road and single span bridge over the River Ver.

**Water and Wastewater:** The Regulation 20 representation from Thames Water did not identify any infrastructure concerns arising from the development on the wastewater network, however they did note that they are aware of capacity concerns at the Markyate Sewage Treatment Works and a scheme is planned to accommodate this.