

Dacorum Local Plan consultation

A summary of CPRE Hertfordshire's initial analysis of Dacorum Borough Council's consultation on its new local plan titled "Emerging Strategy for Growth (2020 – 2038)"

(as of January 15th, 2021)

About us

CPRE Hertfordshire is a local countryside charity. We work to promote, enhance and protect a beautiful, thriving countryside for everyone to value and enjoy.

Founded in 1928 we are a grassroots organisation, with 1400 members and a team of 3 staff and a few dozen volunteers. CPRE Hertfordshire has a long history of campaigning against inappropriate development on Hertfordshire's green spaces. We also work with local groups around the county, providing advice on how they can best protect the countryside near them.

If you would like to help, then please consider becoming a member or making a donation. Full details can be found on our website. www.cpreherts.org.uk, or please email office@cpreherts.org.uk for more information. Thank you.

CPRE Hertfordshire is a Charitable Incorporated Organisation Registered charity number: 1162419. CPRE holds and manages data in strict accordance with the Data Protection Act (2018). Read our Privacy Policy.

Introduction

This document has been compiled by CPRE Hertfordshire's planning specialists and volunteers. It provides a source of information to help members, local organizations and campaign groups develop their response to Dacorum Borough Council's proposed local plan - "Emerging Strategy for Growth 2020 - 2038".

Comments on the plan can be submitted to Dacorum Borough Council by Sunday 28th February, via

- An online and downloadable questionnaire <https://consult.dacorum.gov.uk/kse>
- By post to: Strategic Planning, Dacorum Borough Council. The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN
- By email to: responses@dacorum.gov.uk

General background

- The current stage of the process is a consultation on a draft plan under Regulation 18 of the relevant Planning Acts.
- There is no obligation for Dacorum Borough Council to include all or any of the proposed provisions in the next, formal version of the Plan when it is published.

- Anyone can comment to the Council on any aspect of the consultation document, and can do so in any way they choose, although the Council has asked that they do so via a questionnaire which asks specific questions.
- The Council must consider all comments made that are relevant to the proposed Plan, before deciding what to include in the formal deposit version, also known as the pre-submission Plan.
- The pre-submission Plan must then be subject to a minimum 6-week consultation during which anyone can make representations on whether or not the Plan is ‘sound’ as defined under national policy and Planning statutes.
- Any such representations that the Plan is unsound or not legally compliant will be considered by a Planning Inspector during a subsequent public examination of the proposed Plan.

Our point of view

CPRE Hertfordshire believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan.

CPRE Hertfordshire believes that planning is crucial to empowering local communities and making sustainable, liveable places. Ensuring everyone has an affordable home that meets their needs is essential to that, both in town and country.

Equally, it is vital that new development is planned intelligently. Our countryside is precious and finite and urgently needs better management in the face of the climate and nature emergencies. Critical to this is that land is not lost to development unnecessarily. More new homes are undeniably needed and there is plenty of scope to use previously developed urban land (i.e., “brownfield”) to help address this need.

Our primary concerns

We have a number of concerns about the proposed local plan as detailed in the Emerging Strategy for Growth (2020 – 2038). Each of the concerns are headlined below and supported by a more detailed discussion.

1. Unnecessary impact on Green belt, the Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC)

a) One third of the countryside area in Dacorum Borough is within the Chilterns AONB. This is a designated protected landscape of national importance, which the Borough Council has a legal duty to protect and enhance. As well as ensuring the protection of the AONB area itself, the Borough Council must also ensure the protection of the setting of the AONB. This is the land outside the boundaries of the AONB where inappropriate development could impact on the special qualities of the

AONB, due to its visual intrusion but also due to noise, vehicle traffic and pollution.

Discussion: In 2019 the Glover Report, commissioned by the government's Department for Environment, Food and Rural Affairs (DEFRA), recommended that the Chilterns AONB should become England's next National Park. The land area involved might be expected to include areas recommended by the Chilterns Conservation Board to be included within the AONB boundary. The requested boundary review was submitted to Natural England in 2013 but is still pending.

There is no mention of the Glover Report's recommendation in the Dacorum Emerging Strategy for Growth (the Strategy).

The Strategy proposes that substantial areas of the Green Belt around Hemel Hempstead, Berkhamsted and Tring alongside the AONB boundary should be allocated for housing.

This is contrary to national policy, the Strategy's own policies, and both the Chilterns Conservation Board (CCB) Management Plan 2019-24 and its Position Statement Development Affecting the Setting of the Chilterns AONB (2011, revised 2014).

The CCB Management Plan must be taken into account by Local Planning Authorities when developing local plans within or affecting the AONB and it may be a material consideration when considering planning applications. The 2019-24 Management Plan states:

'A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority's legal duty towards the AONB applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). We have produced special advice in a Position Statement on Development Affecting the Setting of the Chilterns AONB. The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary.'

b) The proposed plan has been published before completion of a screening exercise to establish the impact of the proposed developments on the Chilterns Beechwoods Special Area for Conservation.

Discussion: The Chilterns Beechwoods Special Area for Conservation (SAC) is a site of European importance for biodiversity and wildlife conservation. Following the UK's departure from the European Union the legislation remains within UK law. DBC is the designated Competent Authority responsible for ensuring that no harm is done to the SAC as a result of any development proposals. Much of the area comprises the National Trust's Ashridge Estate, a popular leisure and recreation destination.

Dacorum Borough Council is required to apply the Habitats Regulations Assessment (HRA) process to this area, the first stage of which is a Screening exercise which defines whether any proposals contained in the Dacorum Emerging Strategy for Growth (the Strategy) are considered likely to have any adverse effects on the SAC.

At the time of publishing the Strategy Dacorum Borough Council was in the process of engaging consultants to carry out this Screening.

The housing numbers proposed in the Strategy are such that the increase in population of the Dacorum Borough area would undoubtedly put even greater pressure on the SAC area, which is already suffering damage to its environment due to traffic and car parking, and wear and tear on paths and tracks.

It is irresponsible of Dacorum Borough Council to publish this Strategy without first carrying out the Screening exercise.

The Habitats Regulations Assessment (HRA) process decides whether any local plan or development proposal will impact on an SAC. The first stage of this is the Screening. If the Screening reveals the potential for impacts, the Competent Authority must carry out an Appropriate Assessment (AA). It is important to note that the Screening must not take into account or assess any potential mitigation – this arises from recent case law (the People Over Wind judgement).

The Strategy suggests that certain conclusions have already been reached regarding this process prior to the Screening being undertaken. This includes proposals for compensatory measures and for offsite mitigation set out in Policy DM31. There is a danger that including these in the Strategy at this stage will influence the Screening process.

2. Over provision of housing

a) The proposed local plan prioritizes meeting an excessive level of housing need over protection of the Green Belt on the assumption that this is required by national policy. This assumption is incorrect. Exceptional circumstances for meeting housing need in full have to be shown, and have not been demonstrated in the consultation documents.

Discussion: Dacorum Borough Council acknowledges that Dacorum is a largely rural area (page 19 of the consultation document) and that 85% of Dacorum is rural, 60% is Green Belt, and 33% "of the countryside is within the Chilterns Area of Outstanding Natural Beauty". It also states that a key objective of the plan is "minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB."

This objective is then dismissed by a statement in paragraphs 19.5 and 19.6 that destruction of the Green Belt is permitted in exceptional circumstances, and that these exceptional circumstances are the need to meet their calculation of housing needs in full.

This statement is incorrect in that the existence of need alone does not meet the exceptional circumstances test, as stated tested in legal cases which clarify that there are a number of factors that councils must consider before exceptional circumstances are determined. The National Planning Policy Framework (NPPF) specifically states (paragraph 11b) that Sustainable Development for local plans means, amongst other criteria, meeting housing needs 'unless policies in the NPPF

that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development', listing Green Belt, AONB's and SAC's amongst such 'areas or assets' in footnote 6.

Dacorum Borough Council has failed to follow this national planning policy to take these areas, such as the loss of Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB), into account when proposing the number of houses that should be built.

- a) While using the 2014 based household projections to calculate housing need follows government guidelines it fails to take account of the National Planning Policy Framework which expects local authorities to use the latest available information. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan.

Discussion: The proposed plan makes a number of statements that are misleading and unjustified on housing numbers. They would result in an unsound basis for the scale of future development in the plan, and thus an unsound basis for the removal of land from the Green Belt for such development.

The trends revealed by the latest Office for National Statistics (ONS) 2018-based Population and Household Projections are towards a very significantly lower increase in population and number of households to be catered for than that estimated by the Council's consultants, GL Hearn in their updated South West Herts Local Housing Need Assessment (SWHLHNA) 2020, the Council's main evidence document on housing need.

Using the 2018-based household projections and a proposed new national method to calculate need, the Plan calculated an annual additional housing need figure of 922. The latest government guidance still using the old 2014-based projections would result in an even bigger figure of 1,022 a year.

By contrast, using the 2018-based household projections alone produces an annual household need figure of 341. Allowing for a 3% vacancy rate, and for potential past under-provision, CPRE Hertfordshire believes a realistic and sound estimate of Dacorum's annual housing need over the plan period is in the range of 351 to 536 dwellings per annum. The Council should assess housing numbers for the next stage of the Plan that properly reflect actual observed recent trends in the local population and number of households, rather than slavishly rely on an inappropriate national algorithm that would result in an unsound Plan.

- b) As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.

Discussion: Dacorum Borough Council is proposing to release 746 hectares from the Green Belt for development. This is in addition to 80 hectares of Green Belt released for development via the 2013 Core Strategy for housebuilding that has yet to occur on four sites which are also included in this new proposed Plan: West Hemel, Marchmont Farm, Old Town Hemel, and Hanburys at Berkhamsted. Plus, there are another 23 hectares of other greenfield sites proposed for development, mostly urban infill building on green spaces within towns. Grand total of countryside and green spaces lost if this Plan goes ahead: 850 hectares. That is a massive amount of land, with accompanying loss of biodiversity.

In terms of proposed housing numbers, it's 9,995 on land currently in the Green Belt, plus 1,665 on the four ex-Green Belt sites noted above, plus 379 on other greenfield sites, for a total of 12,039 new houses on Green Belt and greenfield combined. This is out of the minimum total proposed figure of 16,596 / 922 dwellings per annum (dpa). See Appendix for further details.

3. Failure to address climate emergency issues

a) The proposed local plan fails to demonstrate a pathway to local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF), and the 2004 Planning and Compulsory Purchase Act. An evidence-based carbon reduction plan is also required to meet the national climate obligations of net zero by 2050.

Discussion: To meet legal obligations in the NPPF and the 2004 Planning Act Section 19 (1a), Local Plans need to demonstrate how emissions for the area will be radically reduced in line with carbon budgets – a carbon reduction pathway specific to the area. Local Plans also need to effectively show how these carbon budgets will be regularly and effectively monitored. The Royal Town Planning Institute (RTPI) recently communicated this requirement to all planning authorities. The plan as proposed by DBC fails to address these requirements.

Climate Change Committee (CCC) Sixth carbon budget report Dec 2020 contained a set of recommendations for Local authorities to consider in helping them meet their Climate Emergency objectives. There is no evidence in the proposed plan on how these recommendations have been considered.

ClientEarth has put local authorities across England on notice, warning them that they will violate their legal obligations and risk legal challenge if they do not introduce proper climate change plans. Local Plans need to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.

The proposed plan has clearly prioritized economic growth over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various bodies on how carbon reduction plans have to be integral to the development of local plans.

Several local authorities in England (e.g., Greater Cambridge, Reading and Liverpool City) have developed integrated local plans that take account of climate change, biodiversity, well-being and social inclusion. There is no evidence in the proposed local plan of such an approach.

4. Impact on infrastructure

a) The proposed level of development in Dacorum, along with pending development in neighbouring St Albans City and District, Three Rivers District, and in Buckinghamshire east of Aylesbury, would all place an unacceptable burden on all types of infrastructure services, and facilities in Dacorum. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing.

Discussion: The plan as proposed would place an unacceptable burden on services, facilities and other infrastructure in Dacorum, and has not been justified when set against national planning policies and the major constraints that exist in the borough. For instance: clogged traffic in town centres and on the major roads in the borough including the A414 and the A41; insufficient cycling lanes throughout the borough; narrow or non-existent pedestrian pavements in many of the built-up areas; insufficient school places (children in some year groups are currently having to be placed outside their locality); insufficient capacity of the local healthcare system with the nearest acute care in Watford, Buckinghamshire or Bedfordshire.

5. Water supply and wastewater.

a) The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. The proposed plan as presented is largely silent on new sources of water supply and on how it will protect the three designated chalk streams in the borough (the Gade, Bulbourne and Ver).

Discussion: Paragraph 174 of the NPPF states that plans should promote the conservation, restoration and enhancement of priority habitats, and paragraph 175 states that where significant harm to biodiversity cannot be avoided then planning permission should be refused. The NPPF Glossary states that priority habitats are those habitats included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006 (s 41 sites). Chalk rivers are included in the section 41 list.

The 2010 Water Cycle Study (part of the evidence base for the Strategy, produced for five Hertfordshire LPAs including Dacorum), was based on two growth scenarios presented by the emerging Regional Spatial Strategy. For Dacorum Scenario 1 was 9,000 new homes in the plan period 2006-31, and Scenario 2 was 17,000 new homes (680 dwellings a year for 25 years). The Study concluded that Scenario 1 (across the Study area) would not allow any water surplus past 2030, while Scenario 2 would require additional imports of water from 2024 during critical periods.

b) The proposed increase in housing will require substantial investment in infrastructure in order to transport and treat wastewater and sewage. The proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion.

Discussion: The Adopted Core Strategy 2006-2031 for Dacorum Borough states that ‘developers should ensure that there is sufficient capacity at the relevant wastewater treatment works. It also states: ‘The most pressing (infrastructure) issue is that of sewage treatment infrastructure, which will need significant upgrades to serve the development proposed in the wider area, including that in Dacorum.’

The current proposals make no mention of the specific need for sewerage infrastructure improvements (para 10.4 on page 49), although Policy SP7 sets out the mechanism for delivering infrastructure which places responsibility for funding with developers. Policy DM35 (on page 126) states that development which would cause a significant increase in water pollution (among other effects) will not be permitted.

The 2010 Water Cycle Study sets out a long list of wastewater treatment and sewerage issues across the five Local Planning Authority areas which needed to be addressed to accommodate the growth levels proposed at the time. It states (on page 4): ‘a number of potential growth locations are located to the opposite side of existing settlements with regards to the Waste water Treatment Works (WwTW) or trunk sewers. Any network upgrades required through the existing settlement will be expensive and disruptive, and may therefore be cost prohibitive, particularly if funded by developers.’

The above situation applies to housing proposals on the northern edge of Hemel Hempstead. The town’s wastewater currently goes to the Maple Lodge WwTW. The Water Cycle Study states that the Maple Lodge WwTW (or Blackbirds WwTW, dependant on TWU strategy) will require substantial upgrades under both growth Scenarios. Limited space at Maple Lodge WwTW may make this problematic. Higher wastewater flows also have potential impacts on water quality, including downstream of WwTWs, including during storm events which are expected to increase in severity due to climate change. Such upgrades would be disruptive, expensive and require three to five years to plan, design and construct.

It is not explained in the current Dacorum documents whether any of these issues have already been addressed by infrastructure improvements.

6. Underestimate potential brownfield regeneration opportunities

a) The proposed local plan fails to take into account the impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which are likely to result in much greater conversion of commercial space (especially office and retail) to residential use. The potential for such windfall provision of housing throughout the borough is likely to be much higher than that identified in the proposed plan. As a result, such a windfall many of the proposals for development on Green Belt and greenfield sites outside of existing towns and villages are likely to be unnecessary.

Discussion: Dacorum Borough Council should consider promoting mixed use living spaces in town centres. This has the potential to provide much needed affordable housing and provide a sustainable transport solution for local communities. The plan lacks a vision for the long-term future of retail and leisure parks that create better people friendly places and that are not designed around cars. A good example of mixed-use living spaces in town centres is the recent re-development of a retail park in Watford.

In the light of recent events (Covid and Brexit) and trends in the retail sector, the government has announced a new approach to promotion of redevelopment and changes to the way our urban land is used, in particular the reconsideration of how much, and which existing retail, industrial and commercial land and premises can be more efficiently and sustainably used in a different way. The now-expanded permitted development rights allow commercial space to be converted to residential (as well as adding additional storeys on top) without need for planning permission

This new opportunity appears to have been ignored in the preparation of the proposed plan.

7. Over reliance on aspirational growth strategies and partnerships which have not been subject to public consultation and scrutiny.

a) The proposed local plan is based on selective strategy documents that have no formal planning status and which have not been widely consulted on. As a result, the plan does not adequately address important issues such as the climate emergency, the environmental impact of the proposed developments and the prioritisation of brownfield sites to meet housing needs.

Discussion: The Plan is explicitly based on three corporate strategy documents (Dacorum Growth and Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025, and a Corporate Action Plan) as explained in section 3 on page 21. These documents have no 'Planning' status, appear to have only been selectively consulted on if at all, and should not have been used to pre-judge the proposed plan's strategy

or content, which should instead have emerged from the public consultation process. Also, it is not made clear in the documents how the proposed plan reflects the results of the last, “Issues and Options Consultation”, in 2017.

The strategy documents appear to be internally generated within the Borough Council based on the aspirations of councillors and other unelected external organisations with vested interests such as the Hertfordshire Local Enterprise Partnership (HLEP) and other business interests. The Council seems to be using these to pre-judge the direction and scope of the emerging local plan. The plan is missing context from external bodies with a legitimate interest in the Borough such as those with an environmental focus.

8. Implications of withdrawal of St Albans submitted Local Plan

The proposed local plan does not consider the impact of the withdrawal of the St Albans Local Plan

Discission: The Strategy assumes that large areas of Green Belt land east of Hemel Hempstead and in St Albans District will be allocated for residential and employment development as part of the Hemel Garden Communities project. The St Albans Submission Local Plan has recently been withdrawn from Examination as the Inspectors advised that it would not be found ‘sound’. The proposed sites north of Hemel Hempstead (5500dw) in Dacorum must be called into question if there is any doubt on the future viability of the Garden Community project as a whole.

APPENDIX1: CPRE Hertfordshire impact assessment – high level review, by site

The following tables provide a high-level review, by site, of the impact of the proposed local plan.

Proposed Allocations	Code	Hectares total	Hectares Green Belt	Hectares Greenfield	Hectares Brownfield	Dwellings total	Dwellings Green Belt	Dwellings Greenfield	Dwellings Brownfield	Comments
Hemel Hempstead										
North Hemel Hempstead Allocations										
North Hemel Phase 1 mixed use	HH01	212.2	212.2			1550	1550			homes, 2 schools, country park, waste centre, etc
North Hemel Phase 2 (remove from GB for post 2038)	HH02	160.9	160.9			4000	4000			homes, 3 schools, retail & community facilities, abuts SACD
Hospital site (prev MU/2)	HH03	5.93			5.93	450			450	homes, school, open space, revised hospital hub
Paradise/Wood Lane (prev MU/3)	HH04	2.92			2.92	350			350	homes, offices, open space
Market Square	HH05	0.53			0.53	130			130	homes, retail
Civic Centre site	HH06	0.86			0.86	200			200	homes
NCP Car Park, Hillfield Road	HH07	0.22			0.22	100			100	homes, retail
Two Waters Allocations										
Station Gateway	HH08	3.87			3.87	360			360	homes, regenerated rail station, transport interchg, retail, offices, hotel
National Grid Land	HH09	3.41			3.41	400			400	homes, open space
Symbio Place, Whiteleaf Road	HH10	0.22			0.22	180			180	homes, open space
Two Waters North	HH11	2.8314			2.8314	350			350	homes, employment, offices, hospitality, open space adj to canal
Two Waters / London Road	HH12	0.62		0.62		60		60		homes, open space
Frogmore Road	HH13	1.17			1.17	170			170	homes, open space
233 London Road	HH14	0.1			0.1	10			10	homes
Ebbens Road	HH15	0.38			0.38	30			30	homes, open space
Two Waters Rd / A41 Junction Employment Site	HH16	5.6	5.6			0				industrial, commercial, employment
Maylands Allocations										
Cupid Green Depot	HH17	2.9			2.9	360			360	homes, open space
Kier Park	HH18	1			1	250			250	homes, offices, open space
Wood Lane End	HH19	1.88			1.88	160			160	homes, open space
Breakspear Way / Green Lane / Boundary Way	HH20	6.6		6.6		0				offices, industrial, storage, distribution (is near M1)
Rest of Hemel Hempstead Allocations										
West Hemel Hempstead	HH21	55.64		55.64		1150		1150		homes, school, travelers site; REMOVED FROM GB in 2013 Core Strategy
Marchmont Farm	HH22	19.15		19.15		385		385		homes, travelers site; REMOVED FROM GB in 2013 Core Strategy
Old Town	HH23	2.71		2.71		90		90		homes, open space; ALLOCATED in 2013 Core Strategy, WAS IT GB?
Land at Turners Hill	HH24	0.7		0.7		60		60		homes, open space
Land to R/O St Margarets Way / Datchworth Turn	HH25	1.13		1.13		50		50		homes, open space
South of Green Lane	HH26	2.03		2.03		80		80		homes, open space
Jarman Park - out of centre retail allocation	HH27	2		2		0				retail, quasi brownfield, site allocated for development ages ago
Bunkers Park - crematorium allocation	HH28	12.3	12.3			0				cemetery, crematorium;
<i>Hemel sub totals</i>		<i>509.80</i>	<i>391</i>	<i>90.58</i>	<i>28.22</i>	<i>10925</i>	<i>5550</i>	<i>1875</i>	<i>3500</i>	

Table 1 – Land and housing review – by site

Proposed Allocations	Code	Hectares total	Hectares Green Belt	Hectares Greenfield	Hectares Brownfield	Dwellings total	Dwellings Green Belt	Dwellings Greenfield	Dwellings Brownfield	Comments
Berkhamsted										
Land South of Berkhamsted	BK01	33.45	33.45			850	850			homes, school, community hub, open space
British Film Institute	BK02	3.2	3.2			90	90			homes, open space; BFI SITE IS TECHNICALLY W/I GB BUT ALSO PREV DEV'D
Haslam Playing Fields	BK03	6.56	6.56			150	150			homes, open space
Land betw Hanburys and A41	BK04	4.67	4.67			70	70			homes, open space
Blegberry Gardens - land adjacent to	BK05	3.5	3.5			80	80			homes, open space
East of Darrs Lane, Northchurch	BK06	22.73	22.73			200	200			homes, school, park
Lock Field, Northchurch	BK07	2.2	2.2			60	60			homes, open space
Rosway Farm - land betw Shootersway & A41	BK08	12.29	12.29			200	200			homes, open space
Bank Mill Lane	BK09	3.9	3.9			50	50			homes, open space
Hanburys	BK10	1.8		1.8		40		40		homes, open space; REMOVED FROM GB in 2013 Core Strategy
Billet Lane, Jewson site	BK11	0.78			0.78	40			40	homes, open space
Berkhamsted Civic Ctr & land to R/O, High Street	BK12	0.4			0.4	16			16	new civic centre, homes
Gossoms End / Billet Lane	BK13	0.6			0.6	30			30	supermarket & homes, planning permission prev granted but never built
Berkhamsted sub totals		96.08	92.5	1.8	1.78	1876	1750	40	86	
Tring										
Dunsley Farm	TR01	37.25	37.25			400	400			homes, school, employment, retail
New Mill	TR02	14.7	14.7			400	400			homes, open space
East of Tring	TR03	119.11	119.11			1400	1400			homes, community hub, 2 schools, open space
Icknield Way	TR04	1	1			50	50			homes
Miswell Lane	TR05	0.64		0.64		24		24		homes, open space
High Street / Brook Street	TR06	0.95			0.95	0				retail, car parking, offices; existing fire station / Auction house to be moved
Tring sub totals		173.65	172.06	0.64	0.95	2274	2250	24	0	
Kings Langley										
Land adjacent Coniston Road	KL01	0.33		0.33		10		10		homes, open space; planning permission prev granted
Land at Rectory Farm	KL02	8.37		8.37		200	145	55		homes; planning permission prev granted for 55 dwellings; PARTIAL GB
Bovingdon										
Grange Farm	BV01	10.11	10.11			150	150			homes, school, open space
Chesham Road & Molyneux Ave	BV02	1.9		1.9		40		40		homes, open space
Markyate										
South of London Road	MK01	6.25	6.25			150	150			homes, open space
Corner of Hicks Road / High Street	MK02	0.1			0.1	13			13	homes, open space
Watling Street	MK03	0.23			0.23	20			20	homes, open space
Countryside										
Upper Bourne End Lane / Stoney Lane	CY01	1.16	1.16			0				employment, office, industrial, distribution
Bovingdon brickworks	CY02	1.8	1.8			0				employment, office, industrial, distribution
Watling Street truck stop, London Rd, Flamstead	CY03	16.21	16.21			0				lorry park (near M1)
Haresfoot Campus	CY04	7.95	7.95			0				independent (private) school playing fields to replace those at BK03
Renewal Area Designations										
Amaravati Buddhist Monastery	CY05	3	3			0				regeneration of existing site within Chilterns AONB
Bovingdon Airfield	CY06	43.98	43.98			0				film / TV production
sub totals all other excl Hemel, Berko & Tring		101.39	90.46	10.6	0.33	583	445	105	33	
TOTALS		880.9214	746.02	103.62	31.2814	15658	9995	2044	3619	
		hect. total	Green Belt	Greenfield	Brownfield	Dwellings	dw GB	dw GF	dw BF	

Table 2 – Land and housing review – by site (contd)