

Bovingdon Neighbourhood Plan

Consultation Response Form (Regulation 16)

Bovingdon Parish Council has formally submitted its Neighbourhood Plan to Dacorum Borough Council and we would welcome your comments on its contents. The consultation period runs from **Friday 29th September 2023 until Sunday 12 November 2023**.

The Neighbourhood Plan and supporting documents can be found here (add hyperlink). Paper copies of the submission documents are available to view at the following locations:

- Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, HP1 1DN;
- Bovingdon Community Library, High Street, Bovingdon, HP3 0HJ; and
- Bovingdon Parish Council, Memorial Hall, High Street, Bovingdon, HP3 0HJ

Next steps

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By submitting this response form you are agreeing to these conditions.

Please return this form by Sunday 23:59pm 12th November 2023. Either

- By email to: <u>neighbourhoodplanning@dacorum.gov.uk</u>
- Or by post to: Strategic Planning (Bovingdon Neighbourhood Planning) The Forum Marlowes Hemel Hempstead HP1 1DN

Please fill in the details below.

	Full Name:
	Adrian Bell
A	re you completing this form as an
	x Individual Organisation Agent
	Organisation represented (where applicable):

Address and postcode:

E-Mail address:		

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan: $\[X]{X}$

For each of your comments, can you please ensure that you specify the relevant document, chapter and section or policy number, and in each case, whether you support, support with recommendations, oppose, or have comments to make. When commenting please bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement.

Further information

For further information, please contact Dacorum Borough Council Strategic Planning team by email at neighbourhoodplanning@dacorum.gov.uk

To which part of the plan does this comment relate? (please include the Page & Policy/Paragraph number)
BOV T1
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose X Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
Increased traffic with endanger lives – PROPOSED DEVELOPMENT WILL OPPOSE POLICY
(Continue on separate sheet if necessary)

Signature:

Date:

6.10.23

To which part of the plan does this comment relate?
BOVT3/EE3
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose
Please give details of your reasons for support/opposition, or make other comments here:
LACK OF PARKING / PRESSURE ON INFRASTRUCTURE - PROPOSED DEVELOPMENT WILL OPPOSE POLICY

(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?	
BOVCOM1	
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one and	swer
Support Support with modifications Oppose Have Comments	
Please give details of your reasons for support/opposition, or make other comments here:	
PROPOSED DEVELOPMENT WILL OPPOSE POLICY	
(Continue on separate sheet if necessary)	

To which part of the plan does this comment relate?
BOV NE1/2/4/5/6
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer
Support Support with modifications Oppose
Please give details of your reasons for support/opposition, or make other comments here:
PROPOSED DEVELOPMENT WILL OPPOSE POLICY
(Continue on separate sheet if necessary)

To which	art of the plan does this comment relate?
BOV EE	/4/5
Do you sup	ort, oppose, or wish to comment on this part of the plan? (Please tick one answ
	Support with modifications
Please giv here:	e details of your reasons for support/opposition, or make other comments
PROPOS	ED DEVELOPMENT WILL OPPOSE POLICY
(Continue	on separate sheet if necessary)

If you have additional representations, please feel free to include additional pages. Please make sure any additional pages are clearly labelled, addressed or attached.



Spatial Planning Unit Minerals and Waste Team Hertfordshire County Council CHN216 County Hall Pegs Lane Hertford, Herts SG13 8DF

BY EMAIL ONLY

Tel:01992 556227Email:mineralsandwaste@hertfordshire.gov.ukMy ref:SPEU/ECDate:02 November 2023

Bovingdon Neighbourhood Plan Submission Version July 2023

Dear Sir/Madam,

I am writing to provide comments on behalf of Hertfordshire County Council, as the Minerals and Waste Planning Authority.

The Minerals and Waste Planning Authority provided comments on the Pre-Submission Bovingdon Neighbourhood Plan on 08 February 2023. The Minerals and Waste Planning Authority advised that the Development Plan for the area includes the adopted Minerals Local Plan 2002-2016 and the adopted Waste Planning Documents (Waste Core Strategy & Development Management Policies Development Plan Document 2011-2026 and the Waste Site Allocations Development Plan Document 2011-2026) in addition to Dacorum Borough Council's adopted Local Plan. It was requested that mention of the adopted minerals and waste documents should be included within the Neighbourhood Plan.

Appropriate reference to the adopted Minerals and Waste Local Plan documents has been included at Paragraph 1.1.1 of the Submission Version Neighbourhood Plan.

The council raises no concerns with regard to minerals but would like to advise the Parish council of the nature and history of mineral matters within the Neighbourhood Plan Area. The majority of the Neighbourhood Plan Area lies within the Brick Clay Mineral Safeguarding Area (MSA) as identified in the Regulation 18 Draft Minerals and Waste Local Plan (Policy 5 and Policies Map). Brick Clay resource is however not safeguarded in this manner within the adopted Minerals Local Plan 2007.

The Neighbourhood Plan Area also contains the historical location of Bovingdon Brickworks and areas which have previously been worked for Brick Clay. Bovingdon Brickworks have been demolished and there is no longer any brick clay extraction in the area. The Neighbourhood Plan includes text on this matter at paragraph 7.2.6.

With regards to waste, it was previously advised that the management of construction, demolition and excavation waste is a matter of particular concern and that the Waste Planning Authority encourages every effort to be made in the construction of new developments, to minimise waste generated throughout all phases (i.e. demolition, construction and subsequent occupation).

It is noted that the Neighbourhood Plan is supported by Design Guidance (Design Guidance and Code July 2022). The guidance includes some general design guidelines for new development (page 86). The general design guidelines require new developments to make sufficient provision for sustainable waste management, including facilities for kerbside collection, waste separation, and minimisation where appropriate. The guidance also includes an Annex which highlights the key adopted and emerging policies from the Borough Council Local Plans, relevant to the design guidelines. This includes a link to Policy CS29 - Sustainable Design and Construction, which requires new development to comply with the highest standards of sustainable design and construction where possible and asks that developments recycle and reduce construction waste which may otherwise go to landfill as well as providing onsite recycling facilities for waste.

The Minerals and Waste Planning Authority is supportive of the Submission Version Neighbourhood Plan and would like to be notified of any future consultations or progress in relation to Plan preparation.

Yours faithfully,

Emma Chapman

Senior Planning Officer- Minerals and Waste Policy



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- Or by post to: Strategic Planning (Bovingdon Neighbourhood Planning) The Forum Marlowes Hemel Hempstead HP1 1DN

Please fill in the details below.

Full Name:
Anne Barrett
Are you completing this form as an
X Individual Organisation Agent
Organisation represented (where applicable):
Resident
Address and postcode:

E-Mail address:		

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan:

For each of your comments, can you please ensure that you specify the relevant document, chapter and section or policy number, and in each case, whether you support, support with recommendations, oppose, or have comments to make. When commenting please bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement.

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To which part of the plan does this comment relate? (please include the Page & Policy/Paragraph number)
Page 7
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support X Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
I am particularly supportive of ensuring that new developments in Bovingdon include green spaces. I am also keen that we should enable residents to be able to walk safely around the village especially as the High St is so busy with traffic. Accessibility from new developments into the centre of the village is important. We also need to ensure that footpaths are well maintained. Signage around the area could be made more clear.
Signature:
Anne barrett
Date:
12 Nov 2023

To which part of the plan does this comment relate?
Page 9
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer) Support X Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
Bovingdon Green area is a beautiful area and I am keen that this is allocated as a conservation area.

To which part of the plan does this comment relate?

Policy EE3

plans to.

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

Support	x	Support wi	th modificati	ons	Oppose	Have Comments	
						·	

Please give details of your reasons for support/opposition, or make other comments

here:
The High St has become such a congested area and we desperately need to find ways to reduce the congestion. I would fully support New High St development

To which part of the plan does this comment relate?
Com 1
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Please give details of your reasons for support/opposition, or make other comments here:
The existing memorial hall is no longer fit for purpose resulting in local people/groups unable to use the hall. I fully support either renovating the existing hall or building a new hall.
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
HE2
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer) Support X Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
I fully support applying for these assets to be designated to prevent loss or damage.
(Continue on separate sheet if necessary)

If you have additional representations, please feel free to include additional pages. Please make sure any additional pages are clearly labelled, addressed or attached.



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Please fill in the details below.

Full Name:	
Andrew Norton	
Are you completing this form as an	
X Individual Organisation Agent	
Organisation represented (where applicable):	

Address and postcode:

E-Mail address:	

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan: \car{X}

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The Neighbourhood Plan (Submission Regulation 15)
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support X Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
I think it's really great that Bovingdon can have a local plan decided by the local people, so we can have more resources to invest in Bovingdon.
(Continue on separate sheet if necessary)
Signature:

Andrew Norton

Date:

12.11.2023

To which part of the plan does this comment relate?
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer Support Support with modifications Oppose Have Comments
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

o which	n part of the p	lan does this c	comment relate	?		
o you su	pport, oppose	e, or wish to co	mment on this	part of the pla	an? (Please tic	k one answer
ipport	Support w	ith modificatior	ns Oppos	e 🔄 Have	Comments	
Please g nere:	jive details of	your reasons fo	or support/opp	osition, or ma	ke other comm	ients
Continu	e on senarat	e sheet if neces	sean()			
Continu	e on separate		ssaiy)			

To which part of the plan does this comment relate?
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?	
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one Support Support with modifications Oppose Have Comments	answei
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Full Name:				
Are you completing this for	rm as an	Organisation	Agent	
Organisation represente	ed (where ap	plicable):		

Address and postcode:

E-Mail address:	

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Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

Signature:

Date:

To which pa	art of the plan d	oes this com	nment relate	?		
Do you suppo	ort, oppose, or	wish to com	ment on this	part of the p	lan? (Please	tick one answe
Support	Support with m	odifications	Oppose	Have	Comments	
Please give here:	details of your	reasons for	support/opp	osition, or m	ake other con	nments
			,			
(Continue o	n separate she	et it necessa	ary)			

To which part of the plan does this comment relate?	
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one an Support Support with modifications Oppose Have Comments	SW
Please give details of your reasons for support/opposition, or make other comments	
here:	
(Continue on separate sheet if necessary)	

Comment 4
To which part of the plan does this comment relate?
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answe
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:

(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?	
o you support, oppose, or wish to comment on this part of the plan? (Please tick one ar	S\
upport Support with modifications Oppose Have Comments	
Please give details of your reasons for support/opposition, or make other comments nere:	
(Continue on separate sheet if necessary)	

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Please fill in the details below.

	Full Name:
	Revd Charles Burch
A	Are you completing this form as an Individual Individual Organisation Agent
	Organisation represented (where applicable):
	St Lawrencde Church

Address and postcode:

E-Mail address:	_	

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan: γ

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To which part of the plan does this comment relate? (please include the Page & Policy/Paragraph number)
6.2.13 p 36 St Lawrence Hall
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support J Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
As owners of the Hall we support the plan findings that the current Hall is poorly sited with inadequate parking. We intend to sell the Hall to help fund our proposed church extension.
(Continue on separate sheet if necessary)
sited with inadequate parking. We intend to sell the Hall to help fund our proposed church extension.

Signature:

Date:

12.11.23

To which part of the plan does this comment relate?	
6.9.5 p53 St Lawrence Church	
o you support, oppose, or wish to comment on this part of the plan? (Please tick one	answer
upport Support with modifications Oppose Have Comments	answer
Please give details of your reasons for support/opposition, or make other comments here:	
We support the plan to systemd and rearder St Lawrence Church in order to	
We support the plan to extend and reorder St Lawrence Church in order to provide a modern, flexible and comfortable space for both church and commutuse.	inity
(Continue on separate sheet if necessary)	

To which part of the plan does this comment relate?
All
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
We would like to express general support for the Vision and Objectives of the Plan
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?	
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Please fill in the details below.

Full Name:				
Clare Nortor	۱			
Are you completi	ing this forn lividual	n as an X	Organisation	Agent
Organisation r	represented	(where app	licable):	
1st Bovingdo	on Scouts			

Address and postcode:
Scout Hut, St Lawrence Close, Bovingdon, HP3 0HL

clare.norton@icloud.com	

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan: χ

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To which part of the plan does this comment relate? Policy/Paragraph number)	(please include the Page &
Consultation statement	
Do you support, oppose, or wish to comment on this p	art of the plan? (Please tick one answer)
Support X Support with modifications Oppose	Have Comments
Please give details of your reasons for support/oppo	sition, or make other comments here:
The Consultation statement represents a fair pic carried out on the Neighbourhood plan. Young through the school consultations and we can se the Reg 15 plan.	people in scouting were consulted
(Continue on separate sheet if necessary)	
Signature:	

C Norton

Date:

12.11.23

To which part of the plan does this comment relate?

Regulation 15 submission -	Chapter 6 Community,	Natural	Environment and
Heritage			

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

Support X Support with modifications	Oppose	Have Comments	

Please give details of your reasons for support/opposition, o	or make other comments
here:	

BOVCOM1 and 6.2.14 The Bovingdon Community has been extremely supportive of 1st Bovingdon Scouts campaign to rebuild our Scout HQ. We will work with the Parish Council to develop a community youth hub, which will best serve young people in Bovingdon. BOVNE1 Local Green Spaces - Scouts make use of many of the Green spaces listed (Bovingdon Green, The Brickfields and King George V playing fields) and support their designation and protection. BOVNE2, 3, 4, 5, 6 - Protecting and Enhancing Views, Wildlife, Biodiversity, Footpaths and Rights of Way, Trees and Hedges - Scouts explore the local countryside often hiking and camping in the parish, we may be the first inrtoduction young people have to their natural surroundings and we instill in them an appreciation and awareness for the natural environment which can last a lifetime. Protecting and being at one with our natural environment is a core belief in scouting which we believe these Neighbourhood plan policies promote.

(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
Policy BOVT4 Encouraging Walking and Cycling
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
Scouts support sustainable travel by encouraging walking or cycling to meetings,
and therefore fully support this policy.
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?	
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one Support Support with modifications Oppose Have Comments	answei
Please give details of your reasons for support/opposition, or make other comments here:	
(Continue on separate sheet if necessary)	

If you have additional representations, please feel free to include additional pages. Please make sure any additional pages are clearly labelled, addressed or attached.



Ref: SN/LN/JG/H5269-3P Date: 12 November 2023

FAO Planning Policy Dacorum Borough Council By email only

Emailed to: neighbourhoodplanning@dacorum.gov.uk

Dear Sir or Madam,

Re: Bovingdon Neighbourhood Plan Regulation 15 Submission Consultation

I write on behalf of my clients Taylor Wimpey, McCarthy Stone and Whiteacre Ltd. - the collective promoters of proposals for development at Grange Farm, Bovingdon - in respect of the above consultation. My clients welcome the Parish Council's intentions to positively bring forward a Neighbourhood Plan that seeks to meet the development needs for the community of Bovingdon.

These representations aim to provide constructive support and outline the benefits of the proposals currently under consideration with Dacorum Borough Council at both Grange Farm, Bovingdon and Haresfoot Farm, Berkhamsted for the provision of Suitable Alternative Natural Greenspace (SANG).

It is acknowledged that the progression of the Neighbourhood Plan and the promotion of land at Grange Farm have been impacted by unavoidable delays to the Dacorum Local Plan process. For all stakeholders within the development process this reflects significant barriers to meeting acute local and wider housing needs and it is considered that the Neighbourhood Plan can seek to shape and address the benefits of development which we believe are reflected within the Grange Farm proposals.

Update on the Grange Farm Promoters and Proposals

The substance of key elements of the Grange Farm proposals, as promoted and refined over recent years, remain unchanged. They are consistent with the Submission Neighbourhood Plan and would comprise the delivery of several key benefits to the local area. The Grange Farm planning application was submitted to Dacorum Borough Council (planning reference: 23/02034/MFA) for consideration in August 2023 and is currently awaiting determination.

The description of development for the proposals is as follows:

'Hybrid planning application comprising:

- (i) Full application for the construction of 57 dwellings (Use Class C3), (including affordable housing), 59 no. units of Extra Care accommodation (Use Class C2), means of access, landscaping, open space and all other associated works and infrastructure; and
- (ii) (ii) Outline planning application (all matters reserved except access) for up to 129 dwellings (Use Class C3), (including affordable housing), provision of 1.15ha



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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.'

The key benefits of the scheme are summarised below:

- Provision of up to 186 high quality new homes (including affordable) in view of the significantly low position relating to 5-year housing supply in Dacorum (at best 2.39 years with a 5% buffer);
- The provision of specialist extra care housing for older people linked with care in response to a substantial unmet need;
- The resolution of the existing surface water drainage / flooding issues;
- Safe and attractive pedestrian and cycle routes linking to the village and open spaces;
- Early delivery of significant SANG over and above that required by legislation as mitigation, plus biodiversity enhancements;
- Provision of on-site community facilities and land, securing the future ability of local community groups to continue to operate locally;
- Contributions towards improving the current Village Hall;
- New public open space and recreational routes;
- 40% provision of affordable homes (5% above current policy), provided in accordance with a sustainable distribution of development;
- Biodiversity enhancements (above required mitigation levels) within the adjacent wildlife reserve;
- Delivery of high-quality landscape and retention of existing hedgerows and trees on site;
- A Central Green which provides a focal space at the heart of the new community;
- Contributions towards Bovingdon Primary Academy to support SEN pupil teaching facilities.

Relationship with the Neighbourhood Plan Process

Whiteacre have supported the promotion of Grange Farm for a number of years and have worked alongside the parish council, neighbourhood plan group and local community to ensure a high-quality development, which will make a lasting positive contribution to Bovingdon. Representations to the 2021 Bovingdon Neighbourhood Plan draft policies consultation on behalf of Whiteacre endorsed the contents of the proposals. Those proposals included specific support for the proposed allocation of land at Grange Farm (consistent with the then-emerging Dacorum Local Plan at that time).

Alongside this, the representations provided upon the 2021 draft policies illustrated the ability of Grange Farm to satisfy relevant policy requirements for the built, natural and historic environment. It sought to further align and enhance the contribution that the site would provide towards the three social, economic and environmental domains of sustainable development consistent with community's Vision and Objectives. My clients welcome the Steering Group's response to the 2021 consultation in terms of overall positive public support for the Grange Farm.



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The Steering Group's recognition¹ of the assurances provided within the 2021 representations to ensure sustainable delivery of the site together with the additional benefits it is intended to provide such as in respect of specialist housing for older people is also welcomed.

A copy of the response submitted on behalf of our clients to the Bovingdon Neighbourhood Plan Regulation 14 Pre-Submission Consultation (February 2023) is also enclosed. This was provided prior to the submission of application reference 23/02034/MFA regarding proposals at Grange Farm. We note that the Steering Group has responded positively to several of our previously suggested comments and note that some of the detailed amendments may nonetheless assist the Examination.

Policy Context for the Role of the Neighbourhood Plan and Its Relationship to Grange Farm

As set out within the Basic Conditions Statement the details of the Submission Consultation reflect unavoidable delays to the production of a new Local Plan impacting upon housing policies in the Bovingdon Neighbourhood Plan. We recognise that without the adoption of a new Local Plan the Neighbourhood Plan could not allocate sites for housing outside the Bovingdon village development boundary (in the Green Belt). These current representations on behalf of my clients correspondingly reflect the context of policy proposals that cannot specifically address the land at Grange Farm.

In preparing these representations my client notes the shift in emphasis required for the preparation of the Plan to shape future housing growth rather than provide for it, whilst retaining a focus on safeguarding the environment and improving social and economic conditions. These aims are supported. The potential role of the Neighbourhood Plan to direct the provision of facilities that will support and enhance the wellbeing of the community is also noted, alongside a supportive policy framework to improve traffic and transport issues in Bovingdon village.

My clients fundamentally support an expectation that the Neighbourhood Plan is relevant to shaping sustainable development at Grange Farm. The representations previously provided on the Pre-Submission version Plan recognised that its policies may be applied in determining proposals at the site in the future subject to timescales for plan-making and decision-taking.

The relevant legislation, national policy and guidance underpinning the preparation of Neighbourhood Plans clearly defines that any future conflict arising between policies in a 'made' neighbourhood plan for Bovingdon and policies adopted subsequently by the local planning authority must be resolved in favour of the policy most recently adopted. However, within this context the local planning authority should work positively to minimise potential conflicts.

While the Neighbourhood Plan will not be tested against the policies of an emerging Local Plan the proposed housing allocation of the land identified as 'Growth Area Bv01: Grange Farm' first identified as part of the Regulation 18 version Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth, together with the proposed Delivery Strategy for Bovingdon, are relevant considerations. The potential for exceptional circumstances to be demonstrated to justify the amendment of Green

https://www.bovingdonparishcouncil.gov.uk/_UserFiles/Files/Response%20to%20Bovingdon%20Neighbourhood%20Plan%20consultation%20July%202021.pdf



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Belt boundaries and future allocation of the selected site at Grange Farm to meet acute housing need has been clearly indicated.

Relevant to the context for these representations the Dacorum Local Plan 2024-2040 Revised Strategy for Growth recently published for consultation until 11 December 2023 retains the proposed allocation of land at Grange Farm. Paragraph 5.7 of that document sets out:

"We believe that the Grange Farm site continues to offer benefits for Bovingdon. It can deliver a range of housing, including family and affordable homes, community facilities and open space. There is also potential for linked local improvements within the village centre through the relocation of some existing community facilities from there to the site. The scheme also has local support in principle from Bovingdon Parish Council, subject to it delivering a number of key objectives and aspirations of their neighbourhood plan. A planning application has been submitted on the site (Reference 23/02034/MFA)."

Paragraph 5.10 further elaborates that the proposed strategy for Bovingdon would support sustainable development through delivery of specialist housing for older people, increasing the supply of affordable housing and the provision of new community facilities and open space alongside a substantial package of planning contributions.

Our clients fundamentally support the sharing of evidence as part of the Neighbourhood Plan process that has helped to clarify the expectations and benefits of development at Grange Farm. Further to our client's representations to the Pre-Submission version Plan this includes support for Grange Farm to deliver new community facilities while supporting retention of Bovingdon Primary Academy on its current site. It is consistent with the Planning Practice Guidance that neighbourhood planning should assist in this way to establish parameters for the delivery of the site, where the position within the emerging Local Plan can be clarified (ID: 41-009-20190509).

Having regard to national policy in Paragraphs 21 and 28-30 of the NPPF 2023, the role of nonstrategic policies can address detailed matters more appropriately dealt with through Neighbourhood Plans. This includes shaping the provision of infrastructure and community facilities at a local level and management of the built, natural and historic environment. The Neighbourhood Plan can therefore provide relevant detailed policies that should not subsequently be either superseded or duplicated as part of the Dacorum Local Plan.

This means that where (as currently proposed) strategic policies in future address the amendment of Green Belt boundaries and allocation of Grange Farm the site would be delivered consistent with the aims and wishes of the local community.

The community's aspirations, which we welcome having been shaped through engagement with the local planning authority and the process of Neighbourhood Plan preparation, are the focus of these representations. Within our comments we have sought to highlight where on topics such as the critical need for the provision of specialist housing for older people (including Extra Care) as reflected in local and national evidence the Neighbourhood Plan has taken positive steps to express general encouragement while being unable to support site-specific proposals. Our client will continue to engage with the emerging Local Plan in terms of its relevant strategic policies and proposed



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allocations to provide a positively prepared approach to housing for older people (noting the opportunity at Grange Farm).

Thus, our clients would encourage sufficient flexibility in the wording of policies in the Neighbourhood Plan to be applied to proposed development now and in the future. Similar observations are identified in respect of the relationship between strategic and detailed policies in order to seek sufficient flexibility to address priorities such as securing affordable housing provision, mitigating recreational effects upon the Chilterns Beechwoods Special Area of Conservation.

The approach outlined within these representations is therefore consistent with the Planning Practice Guidance (ID: 41-099-20190509) in terms of minimising potential future conflicts between planning policies while seeking to optimise the potential contribution towards sustainable development consistent with the tests under the Basic Conditions and relevant to that achievable from Grange Farm.

Summary

We would appreciate your acknowledgement of receipt of this letter and the attached completed response form. We hope that that the contents are positive and helpful and will assist in the examination of the Neighbourhood Plan. I would be grateful if you could ensure that I am notified of all subsequent stages of the Neighbourhood Plan Examination, on behalf of our clients.

If you have any queries on any of the above, please do not hesitate in contacting me.

Yours Sincerely,



Jon Goodall MA (Cantab) N Director

Encl: Completed Regulation 15 Consultation Response Form Bovingdon Neighbourhood Plan Regulation 14 Pre-Submission Consultation Response Letter (submitted to the Neighbourhood Plan Steering Group February 2023)

For further details please see the submitted Grange Farm planning application reference: 23/02034/MFA and Haresfoot Farm, SANG planning application: 23/02508/MFA



Bovingdon Neighbourhood Plan

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By submitting this response form you agree to these conditions.Please

return this form by Sunday 23:59pm 12th November 2023. Either

By email to:	neighbourhoodplanning@dacorum.gov.uk
by email to.	neighbournoouplanning@uacorum.gov.uk

Or by post to: Strategic Planning (Bovingdon Neighbourhood Planning) The Forum Marlowes Hemel Hempstead HP1 1DN

Full Name: DLP Planning Ltd		
Are you completing this form as an	Organisation	X Agent
Organisation represented (where app Taylor Wimpey North Thames (TWI	-	one and Whiteacre Ltd.

r		
Address and postcode:		

E-Mail address:	

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan:

For each of your comments, can you please ensure that you specify the relevant document, chapter and section or policy number, and in each case, whether you support, support with recommendations, oppose, or have comments to make. When commenting please bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement.

Further information

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To which part of the plan does this comment relate? (please include the Page & Policy/Paragraph number)

Page 29 - BOV H1 (Affordable Housing)

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one

answer)Have comments.

It is acknowledged the policy outlines that a preference will be given to schemes that provide genuinely affordable homes that demonstrably meet the need for affordable housing in Bovingdon. To support this, it is outlined that First Homes will make up 25% of affordable homes at a discount of at least 30%, with a recommended mix of affordable housing for rent comprising 60 social rent/40 affordable rent. It is states that this 60/40 split will be strictly adhered to on Green Belt sites unless an alternative method of providing genuinely affordable homes is proposed.

It is also acknowledged that the Housing Needs Assessment recommendations were for an overall housing mix of:

- 10% 1 bed
- 35% 2 beds
- 40% 3 beds
- 10% 4 beds
- 5% 5+ beds

Whilst we have no objections in principle with the split indicated within the policy and reference to the evidence base for the Neighbourhood Plan, it is considered that greater flexibility should be allowed where sites are delivering above policy-compliant levels of affordable housing noting the target of 35% within the current adopted Local Plan.

Our client welcomes that the criteria (1) of Policy H1 has been updated since publication of Pre-Submission Plan to reflect where alternative methods of securing genuinely affordable housing are proposed and would welcome further strengthening of this to allow the wider objectives of site-specific proposals to be considered.

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To which part of the plan does this comment relate?

Page 30 - BOV H2 (Accessible Housing)

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

Have comments.

This policy outlines that all new homes must comply with Part M of the Building Regulations 2015, with socially rented homes should be built to at least Building Regulations standard M4(2). Alongside this, it is noted that extra care developments must be within walking distance, on a safe and level route or within easy reach by passenger transport, to village shops and services and built to Building Regulations Standard M4(3).

It is acknowledged that Extra Care development needs to allow for safe access to local facilities and need to ensure that units are accessible, however, it is considered that the need for all dwellings within extra care development is unnecessary as these types of development cater for a range of residents with differing needs and not all residents will be wheelchair users. It is considered that this policy should be amended to reflect that a suitable proportion of units and the communal areas within this development should be built to M4(3) standards, in line with the proposed care packages proposed by the service provider.

Our client welcomes the specific reference to Extra Care provision within Policy H2 and would further encourage the policy to express support for proposals that meet identified needs. Consistent with our comments to the Pre-Submission version Plan we consider that the criteria against which proposals should be assessed should reflect the characteristics of this model of provision and the broader considerations of age-friendly design.

In assessing proposals for specialist housing for older people relevant considerations include access to health services, public transport and local amenities (ID: 63-013-20190626) together with the proximity of town centres. Age-friendly design can also enhance the accessibility of housing for older people and improve the quality of place (ID:63-018-20190626). This illustrates that a broader range of criteria may support proposals beyond the walking distance and passenger transport facilities specified in Policy H2. Criteria should therefore be broadened to include reference to the provision of on-site facilities and integration with neighbouring development while encouraging access via safe and level walking routes such as those achievable from Grange Farm including via new proposed pedestrian links from Pembridge Close.

To which part of the plan does this comment relate?

Page 31 - BOV H3 (Design Code) (paragraph 5.5.7 and 5.5.8)

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

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Have comments.

As acknowledged within the supporting text for policy BOV H3, and with regard to the proposals at Grange Farm, it has been identified that there is a susceptibility to surface water flooding at the site arising from the local topography which creates a gentle valley form across the site. This leads to flooding of Green Lane/Leyhill Road junction and an overland flow path through the site and away to residential properties in the east, which is also subject to flooding from this source.

As outlined in the Flood Risk and Drainage Strategy submitted alongside the application for Grange Farm, the proposed surface water drainage strategy relies on discharge into the permeable chalk bedrock underlying the site rather than above-ground SuDs features. It is proposed that an attenuation basin, with deep-bore soakaways in the base, will be provided within the central area of the site and sized to accommodate run-off from all storm events up to and including the 1 in 100-year storm plus 40% allowance for climate change. In a storm event exceeding the design capacity of the surface water drainage system, surface water from the drainage network will be routed away from residential properties and into low-risk areas where it can slowly infiltrate into the ground over time or flow off-site as per the existing situation.

It is considered that the use of above-ground only drainage features would increase the risk of dissolution, through the requirement to concentrate a larger volume of rainfall into an infiltrating area. The proposed drainage scheme will reduce the volume of surface water leaving the site compared to the current situation, therefore, reducing the load on existing infiltration features and the dissolution risks associated with this infrastructure.

Our client therefore considers that while these observations are not expressly related to Policy H3 or the provisions of the design code the drafting at paragraph 5.5.7 and 5.5.8 of the Neighbourhood Plan is overly prescriptive and should be modified to reflect that proposals will be encourage to achieve effective measures for sustainable surface water drainage. In respect of Grange Farm this is relevant to addressing pre-existing drainage conditions and delivery of wider benefits to the village as part of the effective use of land at the site.

<u>Comment</u>6

To which part of the plan does this comment relate?

Page 37 - COM1 (Community and Recreation Facilities)

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

Support.

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Policy COM1: Community and Recreation Facilities outlines that the development of new or enhanced community facilities and services, will be supported. Our clients agree with this approach and have made provision of 1.15ha community land for outdoor sport and recreation and construction of community buildings (Use Class F) including provision of a new Scouts Hut on the Grange Farm site, as outlined within the current planning application for the site and reflected within Dacorum's Revised Strategy for Growth.

It is acknowledged within the supporting text that the local Scouts group do not currently have a building for their use. The Bowls Club have also expressed interest in a new facility on Grange Farm. Letters of support from the local community groups have been provided in support of the proposals on Grange Farm. In relation to criteria (3) of the policy our client considers that for proposals for major development such as Grange Farm that provision of alternative community facilities would be achieved alongside the delivery of new pedestrian links to the village via Pembridge Close and at locations well-located to existing community facilities and open space such as Bovingdon Green.

To which part of the plan does this comment relate?

Page 43 - NE2 (New Areas of Natural Greenspace)

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

V	

Support

Our clients support both criteria outlined within the above policy and acknowledge that the Neighbourhood Plan seeks to make a positive contribution towards the environmental aims of sustainable development.

The Grange Farm site can achieve enhancement of recreational opportunities and connections to the wider countryside (including the Nature Reserve to the west, and Bovingdon Green to the South) within the context of strong, new, and defensible Green Belt boundaries defined by Green Lane/Chesham Road. As part of promoting the site throughout the Local Plan process Dacorum Borough Council was provided with a statement of Potential Green Belt Compensatory Measures (May 2020). This can also be provided to the Parish Council's NP team.

New Public open spaces will also be created within the development, including equipped play areas for the benefit of the whole village, as demonstrated on the latest Masterplan. This also reflects the drainage strategy for the site, which will provide dry landscaped areas, except during and immediately following storms when they will collect runoff, thus contributing to the aims of greenspace and biodiversity net gains.

In particular, Policy NE2: New Areas of Natural Greenspace welcomes the creation of Suitable Alternative Natural Greenspace (SANG), where there is no conflict with other policies within the Neighbourhood Plan. Our clients support this and would outline that an application for the creation of approximately 24 hectares of SANG is currently being considered by Dacorum (application reference: 23/02508/MFA). The early delivery of this SANG is reliant on the proposals for Grange Farm being approved.

X

To which part of the plan does this comment relate?

Page 46 - NE4 (Wildlife Corridors and Biodiversity)

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

Have comments.

Policy NE4: Wildlife Corridors and Biodiversity outlines that all designated Local Wildlife Sites should be protected from the negative impact of development and buffered and that if biodiversity offsets are required in the Neighbourhood Plan Area, Local Wildlife Sites should be targeted to receive these offsets, if habitats are suitable.

Whilst our clients have no objections in principle with the recommendation that LWS can be suitable areas for considering biodiversity offsetting, it should be acknowledged that alternative land for BNG could be suitable, such as areas of proposed SANG, where this is considered deliverable.

To which part of the plan does this comment relate?

Page 70 - Policy T4 (Encouraging Walking and Cycling)

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

Our client notes the provision within Policy T4 to seek that *"major developments should provide orbital and cross routes within their developments, which join up with existing routes"* and highlights that its proposals at Grange Farm would seek to establish a number of new connections such as to the High Street via Pembridge Close and with Bovingdon Green to the south.

Our client supports that the Neighbourhood Plan's aspirations to enhance sustainable transport within the village and deliver improvements to the High Street should be considered as part of the Plan's policies applied to proposals for major development in the future. The improved connections and new facilities proposed at Grange Farm should therefore be assessed under the criteria of relevant policies alongside the potential opportunities that this would provide by freeing up land in the High Street and close to Bovingdon Primary Academy.



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Please return this form by Sunday 23:59pm 12th November 2023. Either

- By email to: <u>neighbourhoodplanning@dacorum.gov.uk</u>
- Or by post to: Strategic Planning (Bovingdon Neighbourhood Planning) The Forum Marlowes Hemel Hempstead HP1 1DN

Please fill in the details below.

Full Name:	
June Gossling	
Are you completing this form as an	
K Individual Organisation Agent	
Organisation represented (where applicable):	

Address and postcode:	

E-Mail address:		

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan: $\[X]$

For each of your comments, can you please ensure that you specify the relevant document, chapter and section or policy number, and in each case, whether you support, support with recommendations, oppose, or have comments to make. When commenting please bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement.

Further information

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To which part of the plan does this comment relate? (please include the Page & Policy/Paragraph number)
BOV H1. Affordable Housing Page 30
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
The research confirms the need for this level of affordable housing. There is a strong pattern of generations of families wanting to stay in the village but finding it difficult to afford it
(Continue on separate sheet if necessary)

Signature:

Date:

12 11 23

To which part of the plan does this comment relate?
Bov H2. Accessible Housing
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
The aging population will create increasing need for accessible accommodation in the future.
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
6.2.13 Community, Natural Environment & Heritage Page37 St Lawrence Church Ha
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
Facilities at the Hall are inadequate and the community as well as the church congregations would be better served by a modern hall attached to the church. There are currently no disable toilets at the church and the only toilet is effectively outside the premises
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
6.3.7 Environment. Bovingdon Green
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
This is supplying by the community and should be must stad at all costs
This is greatly valued by the community and should be protected at all costs. However there is no grazing contrary to the wording in the text
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
BOV T1. Improve road safety
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
Traffic passing through plus drivers parking in the village create a chaotic situation at times, especially when pupils are being dropped off at school in the morning. Safety measures should be put in place.
(Continue on separate sheet if necessary)

If you have additional representations, please feel free to include additional pages. Please make sure any additional pages are clearly labelled, addressed or attached.



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Please fill in the details below.

Full Name:					
Susan A. N	Miller				
Are you comple	eting this form	as an			
Yes	ndividual		Organisation	Agent	
Organisatior	n represented (where app	licable):		

Address and postcode:

E-Mail address:		

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan: γ_{es}

For each of your comments, can you please ensure that you specify the relevant document, chapter and section or policy number, and in each case, whether you support, support with recommendations, oppose, or have comments to make. When commenting please bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement.

Further information

For further information, please contact Dacorum Borough Council Strategic Planning team by email at neighbourhoodplanning@dacorum.gov.uk

To which part of the plan does this comment relate? (please include the Page & Policy/Paragraph number)
Design Guidance and Code, July 2022 - BOVH3 Design Code
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Ve Support with modifications
Please give details of your reasons for support/opposition, or make other comments here:
Fully support Design Code recommendations
(Continue on separate sheet if necessary)

Signature:

Date:

12 November 2023

To which part of the plan does this comment relate?
BOV NE1, 2, 3, 4, 5, 6 and HE1, 2/

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

Support Ve Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
Fully support recommendations and wish to see Bovingdon Green designated a conservation area.
(Continue on separate sheet if necessary)

o which	n part of the p	lan does this c	comment relate	?		
o you su	pport, oppose	e, or wish to co	mment on this	part of the pla	an? (Please tic	k one answer
ipport	Support w	ith modificatior	ns Oppos	e 🔄 Have	Comments	
Please g nere:	jive details of	your reasons fo	or support/opp	osition, or ma	ke other comm	ients
Continu	e on senarat	e sheet if neces	sean()			
Continu	e on separate		ssaiy)			

To which part of the plan does this comment relate?
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?	
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one Support Support with modifications Oppose Have Comments	answei
Please give details of your reasons for support/opposition, or make other comments here:	
(Continue on separate sheet if necessary)	

If you have additional representations, please feel free to include additional pages. Please make sure any additional pages are clearly labelled, addressed or attached.



Bovingdon Neighbourhood Plan

Consultation Response Form (Regulation 16)

Bovingdon Parish Council has formally submitted its Neighbourhood Plan to Dacorum Borough Council and we would welcome your comments on its contents. The consultation period runs from **Friday 29th September 2023 until Sunday 12 November 2023**.

The Neighbourhood Plan and supporting documents can be found here (add hyperlink). Paper copies of the submission documents are available to view at the following locations:

- Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, HP1 1DN;
- Bovingdon Community Library, High Street, Bovingdon, HP3 0HJ; and
- Bovingdon Parish Council, Memorial Hall, High Street, Bovingdon, HP3 0HJ

Next steps

After the publicity period ends, your comments, name, email and postal address will be sent to an independent examiner to consider. The opportunity for further comments at this stage would only be at the specific request of the examiner.

Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this in your comments.

Privacy Notice

All personal data will be held securely by the Council and examiner in line with Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

By submitting this response form you are agreeing to these conditions.

Please return this form by Sunday 23:59pm 12th November 2023. Either

- By email to: <u>neighbourhoodplanning@dacorum.gov.uk</u>
- Or by post to: Strategic Planning (Bovingdon Neighbourhood Planning) The Forum Marlowes Hemel Hempstead HP1 1DN

Please fill in the details below.

	Full Name:
	Gary Cullum
А	re you completing this form as an
	Individual Organisation Agent
	Organisation represented (where applicable):
	Address and postcode:

1		
1		
	E-Mail address:	

Please tick here if you would like to be notified of the Council's decision to 'make' (formally adopt) the plan: γ_{es}

For each of your comments, can you please ensure that you specify the relevant document, chapter and section or policy number, and in each case, whether you support, support with recommendations, oppose, or have comments to make. When commenting please bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement.

Further information

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To which part of the plan does this	s comment relate?	(please include	the Page &
Policy/Paragraph number)			-

Consultation Doc : objectives and vision P2 - ref new housing. It is essential that new housing is inclusive, affordable and accommodates the differing needs of local residents.

Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)

Support X Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
Young people in the past have been forced to move out of Bovingdon. Affordable housing is a must and it is good to see that the draft Neighbourhood Plan echoes DBC's draft Local plan with preferred new housing at Grange Farm and with the Cala Homes application to build 43 homes on the Molyneaux /Chesham Road Ministry of Justice site. All new housing must be sustainable and of high quality and its good to see this reflected in the Neighbourhood Plan
(Continue on separate sheet if necessary)

Signature:

Date:

12 November 2023

To which part of the plan does this comment relate?
Consultation Doc page 3, transport
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support \underline{Ye} Support with modifications \underline{Oppose} $\underline{Have Comments}$
Please give details of your reasons for support/opposition, or make other comments here:
It is essential that levels of Public Transport are maintained. Developers increasingly build homes that do not have oodles of parking space and a comment often appears saying that 'Bovingdon has a good public transcript network'. The numbers of buses have been eroded in the past decade and DBC and HCC might fight to maintain satisfactory levels to enable people without vehicles to get to Watford, Hemel Hempstead, Chesham and Berkhamsted.
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
Consultation document page 4 - questionnaire and consultation. I was pleased with the level of local consultation and the enormous amount of feedback that was received by the Neighbourhood Plan organising team
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
Do you support, oppose, or wish to comment on this part of the plan? (Please tick one answer)
Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

To which part of the plan does this comment relate?
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Support Support with modifications Oppose Have Comments
Please give details of your reasons for support/opposition, or make other comments here:
(Continue on separate sheet if necessary)

If you have additional representations, please feel free to include additional pages. Please make sure any additional pages are clearly labelled, addressed or attached.