

Appendix 6  
Question 16 to  
Question 19



## Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	503
Filtered Respondents	485
Questions	<p><b>Question 16</b></p> <p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>(a) The Government's draft figure of 602 homes a year;</p> <p>(b) The figure of 756 homes a year;</p> <p>(c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula; or</p> <p>(d) Another figure (<i>please specify</i>)</p> <p><i>Please explain your answer with reference to any evidence.</i></p>
Filter	(none)
Consultation Point(s)	<b>ID-4764252-QUESTION-16</b>
Pivot	(none)
Document Name	Question 16 - Summary Report
Created on	2019-04-17 14:07:23
Created by	Strategic Planning Admin

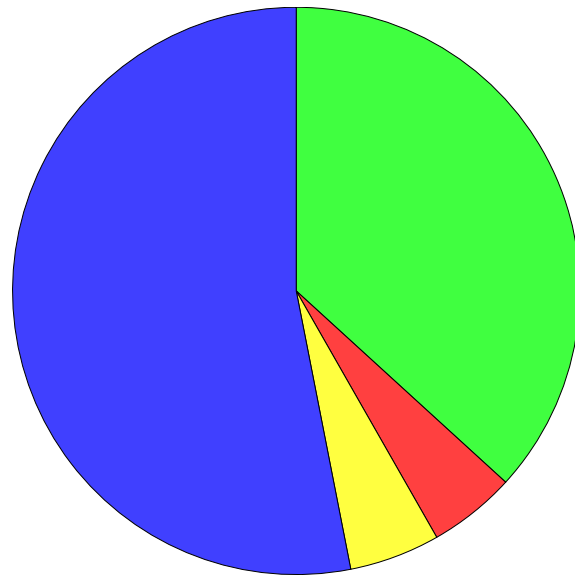
Housing numbers

Question responses: 503 (100.00%)

Question 16

Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

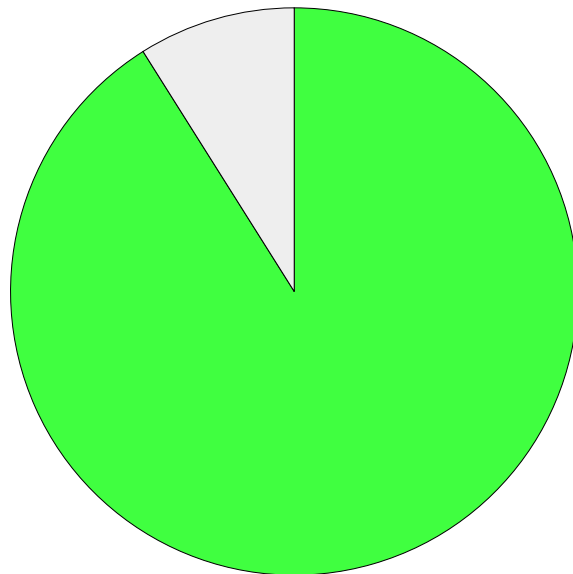
- (a) The Government’s draft figure of 602 homes a year;
- (b) The figure of 756 homes a year;
- (c) The figure of 1,000 to 1,100 homes a year from the Government’s draft standard formula; or
- (d) Another figure (*please specify*)



	% Total	% Answer	Count
<span style="color: green;">■</span> a) The Government's draft figure of 602 homes a year	36.78%	36.78%	185
<span style="color: red;">■</span> b) The figure of 756 homes a year	4.97%	4.97%	25
<span style="color: yellow;">■</span> c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula	5.17%	5.17%	26
<span style="color: blue;">■</span> d) Another figure (please specify).	53.08%	53.08%	267
Total	100.00%	100.00%	503

Responses

Question responses: **458 (91.05%)**



	% Total	% Answer	Count
<span style="color: green;">■</span> Responses	91.05%	100.00%	458
<span style="color: grey;">■</span> No Response	8.95%	--	45
Total	100.00%	100.00%	503

## Supporting evidence

Question responses: 7 (1.39%)



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	1.39%	100.00%	7
■ Responses with No Uploads	98.61%	--	496
Total	100.00%	100.00%	503

## Issues and Options All Responses to Question 16

<b>Number</b>	Question 16
<b>ID</b>	LPIO17
<b>Full Name</b>	Mrs Jennifer Ponsford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	I think the SHMA is the most accurate document however, I think there is a massive need to exercise caution with these figures. No one knows what the outcome of Brexit will be, and this could have a huge impact both on movement of people, jobs and the economy. Post Brexit housing need may decrease massively as loss of thousands of high paid jobs has a knock on effect in the wider economy. We also need to be bold and use house prices as a way of helping to force economic restructuring in the UK as a whole. Migration to other major cities outside the south east has already begun - this is a positive thing that should continue to address the current imbalance in the UK. Building excessive amounts of housing in the South East will slow this process of geographic restructuring.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO35
<b>Full Name</b>	rosie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	More a realistic figure
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO45
<b>Full Name</b>	Mr David Munnery
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO85
<b>Full Name</b>	Mr John Lilley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Once we leave the EU I would like to see a balanced immigration policy, where our overall population stays the same and including growth from new births. Currently 25% of all new births in the UK are to mothers who were not born here, so <1% of the mothers here have 25% of the new births. We are the most overpopulated country in Europe, which has far-reaching issues of food security in the not too distant future. There will be another 1.5 billion Africans within the next 20 years. We need a sensible sustainable policy now. All this issue of housing shortages is a direct result of massive uncontrolled immigration.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO143
<b>Full Name</b>	Mrs Lynne Head
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO170
<b>Full Name</b>	Mr John Shaw
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	



<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	All the options are only estimates and a lot can change in the next few years. I think numbers should be kept to a minimum and SW Herts should not be seen as a relief area for Greater London.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO193
<b>Full Name</b>	Mr Andrew Levy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	I have no doubt that more houses are needed in Dacorum. However, any building that destroys greenbelt, coalesces one town or village with another, pushes already over capacity train and road systems to breaking point, destroys the character of an historic village such as Kings Langley, does not address the housing crisis, but exacerbates it. By focussing only on numbers you will sacrifice quality of life for quantity of homes.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO215
<b>Full Name</b>	Mr Martin Cotton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO217
<b>Full Name</b>	Mr Martin Cotton
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO275
<b>Full Name</b>	Mrs Niki Pinchin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	If anything Brexit will bring a more controlled approach to immigration, unlike it has been to date - therefore we cannot assume growth at the same rate as we have seen.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO284
<b>Full Name</b>	Ms Jane Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Having looked at the office of national statistics it is clear to see that the need for housing is due to the massive increase in the over 65 population and the increase in immigration in recent years. With Brexit coming and tighter rules on immigration planned will the growth figures not need to be recalculated? I don't see any plans for dealing with an aging population in Dacorum who do not work and are likely to have a greater need for medical services.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO312
<b>Full Name</b>	Mr Robert Spence
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This figure has been assessed locally and is a realistic. We should not countenance the housing needs of any other organisations in our own assessments.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO331
<b>Full Name</b>	Mr David Stanier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Doing this figure well will certainly satisfy the initial need and allow a more sensible assessment of the impact on infrastructure and services and encroachment onto the green belt.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO371
<b>Full Name</b>	Mr Michael Bouvier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO392
<b>Full Name</b>	Ms Penny Gore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO418
<b>Full Name</b>	Mrs Carole Freed
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO452
<b>Full Name</b>	Ms Julia Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO510
<b>Full Name</b>	Mr John Saunders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Whilst more houses are needed in Dacorum, a plan that sacrifices greenbelt land, coalesces a town with a village, worsens the already overloaded train and road systems,

	and ruins the character of a quiet village such as Kings Langley worsens the housing crisis.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO512
<b>Full Name</b>	Debbi James-Saunders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	I feel that this is a more workable increase to the area and will have less impact on roads and infrastructure. This must not be achieved at the sacrifice of the Green Belt or to the loss of Kings Langley as a village. Housing needs post-Brexit are not known and a knee-jerk reaction to assumed future housing needs cannot be the answer.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO570
<b>Full Name</b>	Mrs Caroline Williams
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO628
<b>Full Name</b>	Mrs Carole Stokes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO668
<b>Full Name</b>	Mr David Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>There is no logical assessment of any of these numbers in the plan and therefore I would support the minimum 602 or less.</p> <p>I believe there should be numerical analysis of expected need taking into account population growth, age demographics, current council waiting lists etc.</p> <p>Above all the plan needs to provide context - what is the quantity of additional homes as a percentage of the current number of homes in Dacorum area.</p> <p>Assuming currently 64,000 homes (2016) and 23 year plan</p> <p>602 homes x 23 years = 13,846 new homes = 21.6% increase</p> <p>756 homes x 23 years = 17,388 new homes = 27.2% increase</p> <p>1100 homes x 23 years = 25,300 new homes = 39.5% increase</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO705
<b>Full Name</b>	Mr Richard Newell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO713
<b>Full Name</b>	Mr Julian Dent

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Fewer than 300 houses. The plans pay no attention to the recent level of over-development. We have done our bit. We are full. our infrastructure cannot cope with current numbers. Let others than have not done their bit absorb more of the number of houses required.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO719
<b>Full Name</b>	Mr Miguel Patel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>The above figure is the most realistic if the character of the towns and villages in the borough is to be preserved. A jump from the current yearly average of 404 to 602 homes a year is already a considerable increase.</p> <p>Exceeding this rate would surpass the area's capacity in terms of public services and infrastructure and, therefore, would not be sustainable. To note, experience has shown that even at the current rate of home building, infrastructure improvements have been virtually absent. If more schools, hospitals and roads are to be provided, the loss of green space, biodiversity and the coalescence of villages and towns would be unavoidable.</p> <p>The attractiveness of an area with heavy road congestion, over-subscribed schooling and healthcare to prospective buyers must be taken into consideration.</p> <p>One point of huge importance is that Dacorum falls within the London commuter belt, served by the west-coast mainline rail corridor, which is already at full capacity at the peak. This is forecasted to be alleviated somewhat by the construction of HS2. However, within the</p>

	<p>timeframe set out in the local plan, much of the proposed housing (most notably in options 2 and 3) would be in place prior to the completion of HS2. Increased freight movements during construction, which will reduce passenger train paths, will further deplete Euston station's capacity to receive commuters.</p> <p>Given that train services are already at capacity and the construction of HS2 will constrain Euston for at least another 9 years, it is difficult to envisage how housing growth in excess of 602 homes a year could be sustained.</p> <p>No meaningful reference is made to rail infrastructure, which is a fundamental given that Dacorum falls within the London commuter belt, served by the west-coast mainline rail corridor, which is already at full capacity at the peak (see DfT). This is forecasted to be alleviated somewhat by the construction of HS2. However, within the timeframe set out in the local plan, much of the proposed housing (most notably in options 2 and 3) would be in place prior to the completion of HS2. Increased freight movements during construction, which will reduce passenger train paths, will further deplete Euston station's capacity to receive commuters.</p> <p>Given that train services are already at capacity and the construction of HS2 will constrain Euston for at least another 9 years, it is difficult to envisage how housing growth in excess of 602 homes a year could be practicable.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO800
<b>Full Name</b>	Mrs Catherine Marks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	However, I think each year houses should be built on a "needs" basis rather than finding sites and saying how many need to be build b 2036. No-one can predict the



	future so I think it's better to be reactive rather than proactive in this case. It will then prevent loss of greenbelt unnecessarily.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO801
<b>Full Name</b>	Mrs Catherine Marks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	However, I think each year houses should be built on a "needs" basis rather than finding sites and saying how many need to be build b 2036. No-one can predict the future so I think it's better to be reactive rather than proactive in this case. It will then prevent loss of greenbelt unnecessarily.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO821
<b>Full Name</b>	Mrs Karen Bevan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	As low a number as are NEEDED, start at the previous Gov. figure of 430, accept that may have to increase it to 602 but only if necessary. Do this by making sure that the type of houses built are for local need, not to attract people from other areas which would drive prices up and local people out.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO864
<b>Full Name</b>	Mr Stephen Bevan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The approach for Berkhamsted for building new houses should be as low a number as possible. The previous government figure of 430 should be the starting point which may have to increase to 602 if completely necessary. This would only be for local need and not for attracting people from outside the area who will drive the price beyond the range of the local community.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO884
<b>Full Name</b>	Mr Ian Jones
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	It should be a low as possible given the grow that has already been achieved above plan and the constraints of access green belt transport and infrastructure.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO926
<b>Full Name</b>	Mr Stuart Reid
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	A maximum of 50 is still too much for the town's infrastructure.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO927
<b>Full Name</b>	Ms Stephanie Knowles
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO971
<b>Full Name</b>	Mr Robin Knowles
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	50 per year. Kings Langley is full in terms of infrastructure, so there should not be any major increase in housing to support people from London moving in.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO995
<b>Full Name</b>	Mrs Saunders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1034
<b>Full Name</b>	mr Tish Seabourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	1 476 Urban Capacity with a maximum cap of 602 as per the Government's draft figure • The starting point should be the Urban Capacity that doesn't

	<p>require any Green Belt release • The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply. • 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1087
<b>Full Name</b>	Mrs Pauline McLeman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1088
<b>Full Name</b>	Ms Tish Seabourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year

<b>Your response - Please add your response here</b>	The current adopted local plan was 430. DBC urban capacity is already 11% higher than target without any further release of Green Belt. Consideration of higher buildings in appropriate areas would release more capacity without infringing on the Green Belt. DBC figures also ignore the major extension to east Hemel proposed by St Albans, Notwithstanding St Albans reluctance to co-operate at this time, (which is highly unjust) figures from that development should be incorporated which should amount to a minimum of three years housing supply.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1109
<b>Full Name</b>	Miss Melanie Mackney
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	I think a) 602 is a realistic starting sustainable figure, we obviously need more housing which has been neglected for years, but unreasonable to flood the area now when you don't know where or how it's going to work best
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1147
<b>Full Name</b>	Mrs Morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Why propose more than even the Government suggests? Given all the constraints: lack of infrastructure, schools, roads, etc. it is audacious of the Council to propose even more. What deal has it been offered? What is really behind the planners pushing for some many more?
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1189
<b>Full Name</b>	Miss Kylie Jones

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>The above figure is the most realistic if the character of the towns and villages in the borough is to be preserved. A jump from the current yearly average of 404 to 602 homes a year is already a considerable increase.</p> <p>Exceeding this rate would surpass the area's capacity in terms of public services and infrastructure and, therefore, would not be sustainable, the loss of green space, biodiversity and the coalescence of villages and towns would be unavoidable.</p> <p>The impact on Kings Langley and its residents if more than 602 homes a year are developed is significant. Heavy road congestion, poor air quality, over-subscribed schooling and healthcare, limited access to open green space, coalescence with neighbouring towns and villages and an irreversible impact on the village's culture and heritage would be unavoidable.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1209
<b>Full Name</b>	Mr Bernard Richardson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1267
<b>Full Name</b>	Sarah Harper
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Whilst there may be a lot of logic to use the Govt figure of 602, I think a lower figure would be more appropriate as no account is taken of actual capacity. If there is only the space to build 200 or 400 then that is what should be built. There is no justification for building on Green Belt land. The future housing demand is a forecast behind which there are many assumptions, many of which will change over time.</p> <p>I think there should be a shorter term plan that reflects developments already completed and tries to build the lowest number possible going forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1356
<b>Full Name</b>	Mr Andrew Calderwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	(d) Another figure. DBC have already calculated the number achievable at 476 per year.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1380
<b>Full Name</b>	Mr John Ingleby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Forecasts of future UK economic performance vary widely, between hugely optimistic and gloomily pessimistic. The Council should proceed as cautiously as possible by choosing the lowest figure (602 homes per year) that can lawfully be adopted.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1397

<b>Full Name</b>	Mr Matt Clarke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The government figure has been adopted across the country. There needs to be more emphasis on high rise developments where possible and supported by transport and local infrastructure rather than local authorities deciding that we need the govt. number or higher irrespective of the local issues.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1448
<b>Full Name</b>	Mr John Ingleby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	"Housing need" is a completely misleading term. It is a government-imposed figure that bears no relation to the local need for new housing that would enable: a) young people to buy their first home in the community where they grew up, and b) retirees to live within walking distance of their children and grandchildren These are the real human needs that create "a thriving community". ("Thrive" = to grow or develop well or vigorously).
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1474
<b>Full Name</b>	Ms G Puddiphatt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).



<b>Your response - Please add your response here</b>	<p>A maximum of 50 houses per year.</p> <p>How can Dacorum be able to support 602 houses PER YEAR up to 2036? There should be a huge push back by David Gauke about this yearly figure. If Developers have anything to do with it, half of Ashridge Forest will be built over. The urban sprawl and encroachment and destruction of our natural environment even more of an issue.</p> <p>you ask for evidence to support the figure, yet you have not provided any evidence yourselves to support your figure. Finger in the wind, in an uncertain political and economic time.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1497
<b>Full Name</b>	Mr Chris Marks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	No need to build unnecessarily. Immigration is down these projected figures may decrease further.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1577
<b>Full Name</b>	Linda Hattersley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Stay Below the 602 as we have already taken in a great deal of new housing in Berkhamsted
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1609
<b>Full Name</b>	Mrs Susan Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	An urban capacity of 476 with a maximum cap of 602 as per the Government's draft figure. The urban capacity should not require any Green Belt release.
<b>Include files</b>	

<b>Number</b>	Question 16
<b>ID</b>	LPIO1741
<b>Full Name</b>	Mr Kenneth Watts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The Government's new target calculation is clearly politically motivated and should be contested by Dacorum. The Government's threatened implementation of almost doubling their own draft figure if a local plan is not in place is clearly a 'strong arm' tactic to impose unrealistic numbers on local authorities but also a great incentive to get a new local plan in place. A 40% increase in housing provision seems more than adequate but almost doubling it smacks of a transfer of burden from London to the home counties.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1793
<b>Full Name</b>	Mrs Pamela Kingsland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Much less than 602 a year. Suggesting accepting the the first figure the developers will go right to the wire every year. Liketo know how the government come up with this figure.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1826
<b>Full Name</b>	Mr. Philip China
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year

<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1850
<b>Full Name</b>	Mr Richard Case
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>d) Another figure - 476 The DBC figure for Urban Capacity.</p> <ul style="list-style-type: none"> <li>I do not believe it is reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. I support BRAG's contention that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> <li>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider</i> </li> </ul>

area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. Please note for the sake of clarity, I am not proposing that adoption of the plan should be left to the last possible date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1877
<b>Full Name</b>	Mrs Alison Hales
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This part of Hertfordshire is already at capacity. Roads are clogged up, trains are full and the buses are stuck in the traffic through Kings Langley. By choosing A we can avoid building on Green Belt land.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO1974
<b>Full Name</b>	Mr Robert Emberson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	d) the existing figure of 430 in the Core strategy. It was considered correct at the time it was decided on & I do not see any reason to chane this. (Please see comments to question 33 as to the detailed reasons.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2059
<b>Full Name</b>	Mr Christopher Giddings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2066
<b>Full Name</b>	Mr Lawrence Sutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2163
<b>Full Name</b>	Mr Les Mosco
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>476, Urban Capacity</b></p> <p>The recent DCLG “Planning for the right homes in the right places: consultation proposals” state that <i>Local planning authorities then need to determine whether</i></p>

	<i>there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This and Government's recent strong commitments to preserving the Green Belt must be used by Dacorum to argue that because it has an unusually high proportion of its area designated as Green Belt, AONB and SSSI, then additional housing is necessarily constrained by the Government's own priorities.</i>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2212
<b>Full Name</b>	Mrs Melanie Flowers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Lower than the government's figures - I realise that there is a pressing housing need and that the pressure to build housing comes from Central Government, but why is the focus not being placed on developing employment and associated housing outside the already overdeveloped South East? The maximum that should be considered is the government's draft figure.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2214
<b>Full Name</b>	mr malcolm allport
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	It's all very well building new housing in this area the problem is doctors surgeries, schools etc can't cope with the amount of people living here now. With new housing will come parking problems the roads are already littered with cars obstructing the lanes and pavements not to



	mention the increase in traffic on our over crowded lanes leading in and out of the village.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2290
<b>Full Name</b>	mr David van Rhee
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	but the mix should be weighted toward affordable housing. It would be nice for our children to be able to afford to stay in the area if they want to. Currently, due to lack of supply, prices make this unaffordable.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2321
<b>Full Name</b>	Mr George Bull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I believe that the government's draft figure of 602 housing completions a year should be adopted until the number of new homes subject to planning consents, but which have not yet been constructed, is known. At that point, the pipeline of completions will be ascertainable. That can then be compared with the government's draft figure, the new draft standard formula and other computations to determine whether the figure of 602 should be varied.</p> <p>It should be noted that the pipeline is potentially very large. For example, site LA5 to the west of Tring is not the subject of this consultation but has the potential to provide 240 houses once the planning process has completed:</p> <p><a href="https://www.cab.co.uk/land-and-planning/planning-applications/dried-wayring">https://www.cab.co.uk/land-and-planning/planning-applications/dried-wayring</a></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2393
<b>Full Name</b>	Dr Nick Hodsdon

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The figure should not be driven by some estimate from central government, but driven solely by the local need and capacity based on detailed local knowledge.</p> <p>This will take into consideration who the homes are for, what capacity the local infrastructure can support and the availability of suitable sites.</p> <p>Homes should be build for local people performing local jobs. Any retail or commercial development should be aimed at creating jobs for local people and not draw people in from outside the area and therefore creating further demand for local housing</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2399
<b>Full Name</b>	Mr David Glenister
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Construction of 500 homes / year is a more realistic and achievable target.</p> <p>St Albans Council should be included within this Housing Market Area because of its strong links to the rest of the area and good transport links to London. Any infrastructure costs for development on land in close proximity to M1 on east side of Hemel Hempstead should be shared between St Albans and Dacorum.</p> <p>Why is Long Marsden (including old airport site )not considered for the development of new housing? With the appropriate transport infrastructure in place it would make sense to utilise this area. Marston is a small village to the north of Tring in Hertfordshire, in the Tring Rural parish council area. It is in the Borough of Dacorum, Tring West and Rural Ward. It is located roughly 5 miles east of Aylesbury and 11 miles north-west of Hemel Hempstead.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2404
<b>Full Name</b>	Mrs Joanne Carrington

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	It is ridiculous to exceed the governments draft figure. Our area's infrastructure will struggle enough with another 602 homes per year, let alone more. Let our area grow and thrive, not grow and struggle. Let common sense prevail!
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2435
<b>Full Name</b>	Mr Paul Crosland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The Government's draft figure is the only one which appears to have some substantiation.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2474
<b>Full Name</b>	Mr Timothy Copeman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	you cannot generalise any number in this way, it is a question as to what is sustainable in the local community/area and needs to be decided on a case by case basis using a statistically based model
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2540
<b>Full Name</b>	MRS Lesley Culley
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	I note you talk about " local housing need" and housing people from outside Dacorum. We are doing that already. As far as I can see much of the new housing in Berkhamsted has been bought by people moving out of London. So the idea that decorum local housing plan is to meet "local needs" is completely flawed. This area has always been a place people moved to from London: that was the raison d'être of Hemel Hempstead new town and indeed the Hall Park estate where I live.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2582
<b>Full Name</b>	Mr John Morrish
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	It is recognised that the UK needs more housing and that this has to be shared out across the country using a national formula to be fair and objective. It is crazy for DBC to want to provide more than the government maximum and our crowded borough cannot cope with more than the government target.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2651
<b>Full Name</b>	Mr Alan Andrews
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Land behind my house already sold off to local developer for housing. Done without consulting residents. As far as I'm concerned no further housing should be built especially on greenbelt land. Seems like a knee jerk reaction.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2695
<b>Full Name</b>	Mrs Marriott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The figure should consider the actual capacity of the area to accommodate the housing. Government target should be adopted and reconsidered in relation to the actual constraints associated with the areas. Just because there is a target number, that doesn't mean it can be delivered. Just working with numbers do not indicate a gradual organic growth relating the needs and aspirations of the areas and communities. We accept that towns and villages need to grow as that is what will contribute to the economic growth. However it needs to happen in a controlled and sustainable manner.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2705
<b>Full Name</b>	Mr Norman Allan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Current housing plan number of 430 should be the maximum and preferably much lower. Employment and housing countryside should be focused on Brown Field sites. These areas should have incentives to attract work so that people are attracted to move there. The house prices would be more affordable for the young and those on nearer to average wages. There is no way that average wage workers can afford to live in Chelsea or even villages in our area unless employers subsidise to get key staff. This can only happen through rental not ownership.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2734
<b>Full Name</b>	Mr James Puddiphatt

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Less that 602 homes per year. It's not sustainable. We don't need this level of housing at all. Tell Mr Gaukr to get himself back to government and let them know hats what the local,people are saying. We need to be listened to and not paid lip service
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2776
<b>Full Name</b>	Mr Cyril Mills
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	It is difficult to find the figures credible and based on local need in these uncertain times. Homes are undoubtedly needed that are affordable and are based on a plan to incrementally add to local communities. In smaller developments a problem is that there are not the same requirements on developers in terms of amenity and infrastructure but these things are necessary to grow meaningful thriving communities
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2809
<b>Full Name</b>	mrs Gillian Hooper
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	the draft figure presents a national review which should be the maximum aimed for.
<b>Include files</b>	
<b>Number</b>	Question 16

<b>ID</b>	LPIO2870
<b>Full Name</b>	Mr Antony Harbidge
<b>Company / Organisation</b>	Berkhamsted Residents Action Group (BRAG)
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> <li>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints</li> </ul>

of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2955
<b>Full Name</b>	Mr John Lunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The government figure as long as the current figure is the max value
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2963
<b>Full Name</b>	Mr Ivor Eisenstadt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The plan indicates that whatever formula is chosen it will see 'a substantial increase over the current housing target and historic rates of building in the area'.</p> <p>The aim must be to have a plan that ensures that the right type of housing is built in the right places to meet the needs of the population. By definition then targets should be built bottom up not top down. Centrally imposed targets will ensure that we build the wrong houses in the wrong places.</p> <p>We need affordable housing where the jobs are. This means building homes in proximity to the Maylands Estate. In reality how many new jobs are there going to be in Berkhamsted when businesses are already leaving due to office space being converted into residential accommodation?</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO2964
<b>Full Name</b>	Mr Ivor Eisenstadt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The plan indicates that whatever formula is chosen it will see 'a substantial increase over the current housing target and historic rates of building in the area'.</p> <p>The aim must be to have a plan that ensures that the right type of housing is built in the right places to meet the needs of the population. By definition then targets should be built bottom up not top down. Centrally</p>

	<p>imposed targets will ensure that we build the wrong houses in the wrong places.</p> <p>We need affordable housing where the jobs are. This means building homes in proximity to the Maylands Estate. In reality how many new jobs are there going to be in Berkhamsted when businesses are already leaving due to office space being converted into residential accommodation?</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3005
<b>Full Name</b>	Mr Paul Stanbridge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	A number calculated to avoid use of Green Belt.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3074
<b>Full Name</b>	Mrs Rosie Eisenstadt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	What can be built without using Green Belt land. If that's lower than 602 then so be it.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3081
<b>Full Name</b>	mr hugh siegle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

<b>Your response - Please add your response here</b>	<p>The start point is the current Core Strategy figure of 430. Contrary to the statement under 6.1.4 the Government consultation does not 'indicate a higher figure 1000-1100 would need to be used post September 2018'. There are transitional and grace periods proposed where there is an approved Plan in place which would apply to Dacorum. We are not St Albans. It is troubling that Dacorum choose to interpret Government intentions in such a negative and potentially disastrous way unless it is to draw attention to the apparent preference for an uplift to 756 new homes pa, an increase of 75%.</p> <p>At least the Government recognises the difficulty Council's may have in meeting increased targets, hence the cap at 602, and it is also the case that physical and policy constraints have relevance to the final assessment of need. This has been clearly reinforced by Planning Inspectors, including the one who examined Dacorum's Core Strategy..</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3101
<b>Full Name</b>	Mrs Carolyn Hill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>476.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however I concur with BRAG who contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3114
<b>Full Name</b>	Mr John Whiteman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Given the many uncertainties, and the heavy financial and social cost implications of larger scale development, the lowest number that is legally possible should be used
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3143
<b>Full Name</b>	Mrs Kathryn White
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	This is the area specific figure.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3153
<b>Full Name</b>	Mr John Walker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Less than the Govt thinks because it has no regard for local infrastructure issues
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3199
<b>Full Name</b>	Mrs Juanita Mann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	With birth rates now reported as falling & the impact of Brexit perhaps these figures need reworking.
<b>Include files</b>	

<b>Number</b>	Question 16
<b>ID</b>	LPIO3232
<b>Full Name</b>	Mr George Wheway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The economy is uncertain due to Brexit so we should be cautious in our numbers.  In the Brandon Lewis letter the former housing ministers words are still Government policy. That is to say - councils decide how many houses to build not Government.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3252
<b>Full Name</b>	Mr Peter Hadden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3281
<b>Full Name</b>	
<b>Company / Organisation</b>	Premier Property Acquisition
<b>Position</b>	
<b>Agent Name</b>	Mr Jonathan Buckwell
<b>Company / Organisation</b>	DHA Planning
<b>Position</b>	Director
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	Given the early stage of the Local Plan review, it is highly unlikely that the Local Plan will be adopted prior to September 2018, which is the point at which the Government consultation indicates that the new formula-based approach to calculating housing need will

	<p>show a need for up to 1,100 homes. If the Council proceeds with the lower figures of 602 or 756 at this stage, it is highly likely that by the time of the Local Plan Examination, the new Local Plan will fail to meet identified needs and it is likely to be found unsound. This would represent a poor use of resources and will have wasted the time and money of all of those participating in the Local Plan process.</p> <p>It would be much more sensible to plan properly for up to 1,100 homes, otherwise the Council will very quickly find itself without a five-year supply of housing and to be fighting appeals and unwanted speculative development. The Local Plan should be used instead to properly plan for likely development needs over the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3362
<b>Full Name</b>	Mrs Diana Calderwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Less than the current of 476 and in urban capacity not green belt. Also 'needs' required rather than 'developer wishes' which may not prove to be the high numbers estimated as necessary. Berkhamsted has had many new homes added over the past 10 years and our schedule for new homes is ahead so the pressure should be less and the market town character respected.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3370
<b>Full Name</b>	Mrs Victoria Bate
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3371

<b>Full Name</b>	Mr B. Bradnock
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	Please see paragraph 2.28 and 2.29 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (7)</a>
<b>Number</b>	Question 16
<b>ID</b>	LPIO3424
<b>Full Name</b>	Mrs Ann Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3478
<b>Full Name</b>	Mrs Louise Saul
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3502
<b>Full Name</b>	Mr Ashley Martin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The current figure of 476</p> <p>DBC need to exercise extreme caution when setting its target and need to fully exhaust all the possibilities that can be derived from the use of brownfield sites and the use of sites where planning has already been granted but not utilised. Due to uncertain forecasts, especially with immigration falling, DBC should adopt the lowest number it can lawfully use. DBC also need to take account of current government policy which requires the consideration of a myriad of environmental matters including green belt and AONB considerations meaning that a plan can be lower or higher than the local housing need.</p> <p>DBC have ignored in its calculations the major extension at Gorhambury proposed by St Albans as required under the duty to co-operate. This needs to be taken into account in the housing numbers.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP103543
<b>Full Name</b>	Dr Rachael Frost
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The rationale for the projections and the formulae they are based on are not explicitly reported anywhere. The assumptions these are based on and the associated level of uncertainty is also unclear, particularly given the uncertainty surrounding Brexit. The government's idea to inflate housing figures based on lack of affordability will ridiculously increase the housing figures for Dacorum - local government should instead focus on enforcing a reasonable amount of affordable housing (at least 50%) and at least half of this as social housing. This will sort the affordability problem. Housing need should take account of the reasonable capacity current infrastructure can provide in this area. We should also refuse to take further development from Welwyn or London unless their councils agree to significantly high amounts of investment in our infrastructure.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP103575
<b>Full Name</b>	Mrs Sandra Jackson
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>No further houses should be built in Dacorum unless brownfield sites or redevelopment of poor quality housing stock from the 1960s &amp; 70s. There are many areas within Hemel where the existing housing dreadful quality. Rebuild these into modern taller developments and leave the fields and green spaces alone.</p> <p>The figures you have provided could well be back of an envelope jottings because you do not provide here evidence of how you reach these figures. "28 houses a year" additionally required in Dacorum because of market signals is woolly at best.</p> <p>The options of 1a,b,c, 2 a,b,c and 3 mentioned within the development proposals do not match with the figures you are providing here. This consultation is flawed because you are already trying to foist higher numbers of new dwellings than is required by Government.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP103602
<b>Full Name</b>	Mrs Linda Warren
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This is more than adequate ,any more would change the character of the areas in discussion.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP103649
<b>Full Name</b>	Mr Gruff Edwards
<b>Company / Organisation</b>	Dacorum Environmental Forum Waste Group
<b>Position</b>	Chair
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

**Your response - Please add your response here**

Dacorum's figure should be no higher than the 430 p.a. for the plan period (2006-2031) of the Pre-Submission Core Strategy of November 2011.

It is noted that the Borough is being required to build houses because of Government pressure. The housing crisis in London is due to several factors, not only shortage of houses, but prices that put them beyond the reach of most Londoners. Speculative rental investment by non-occupying owners, unoccupied houses owned by overseas investors, and a rental market dominated by easy access to buy-to-let mortgages, all contribute to inflated house prices and the housing crisis that we are currently experiencing. It is not the role of Hemel Hempstead to pick up the tab for this situation.

All the figures in the current consultation can be traced back to Office for National Statistics (ONS) forecasts. Specifically, under "Calculating Local Housing Need" (6.1.10) a figure of 756 p.a. from the SHMA (Strategic Housing Market Assessment) is quoted. The SHMA contains (4.18 Page 39) "The most up-to-date projections are the 2012-based CLG Household Projections published in February 2015. These projections were underpinned by the ONS (Office for National Statistics) (2012-based) Sub national Population Projections (SNPP) – published in May 2014." The ONS Website says that this (published in May 2014) is not the latest release. Their forecasts in any case always admit ranges of uncertainty, particularly as to the levels of net inward migration to the UK. Over the next 10 years, ONS expects 54 per cent of population growth in the UK to be caused by net migration, but past predictions have been hopelessly wrong and current predictions are fogged by political uncertainty, particularly in view of the unknown effects of Brexit on immigration, and of a nearby Oxford – Cambridge corridor on housing demand. In addition to its "principal" projection, ONS produces "variant" projections, reflecting the effects of changes in the various factors underlying population, such as fertility rates and proportion of younger people (i.e. of childbearing age) in the overall population. For 2041, the highest projection among these is 77m people, the lowest is 67.3m. These uncertainties should be contrasted with the certainty and permanence of the loss of Green Belt and urban green space once the development based on those predictions has taken place.

In the October 2017 National population projections, which are 2016-based and slightly lower than the previous ones, the Office for National Statistics ascribes the lower projections to a number of factors, including reduced net immigration, lower than anticipated fertility and more modest increases in longevity than previously anticipated. Over the next 10 years, it expects 54 per cent of population growth in the UK to be caused by net migration where past predictions have been hopelessly wrong and current predictions are fogged by political uncertainty. ONS estimates that Population growth in the next 25 years will be lower than in the last 25 years: 7.3m until 2041, compared to 8.2m between 1991 and 2016.

	<p>Our infrastructure and our public services already face mounting and unbearable pressure for at least another century. When one considers the huge range of variant projections for population growth in both short and long terms, it is clear that multiple factors contributing to population growth offer the Government multiple levers to affect it. A joined-up strategic policy for sustainable population in the UK is needed now more than ever.</p>
<b>Include files</b>	

<b>Number</b>	Question 16
<b>ID</b>	LPIO3695
<b>Full Name</b>	Mr Andrew Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Purely because none make any sense. Is it right that Be-h4 is a site designated for 225 home or 37% of a), 30% of b) or 22.5% of c)? That doesn't seem to be fair or proportionate over an entire Council district. let alone HCC.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3727
<b>Full Name</b>	Mr Peter Howard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Government's figure should be a maximum of 602, but with no building on the Green Belt. It is unnecessary and exceeds DBC's own assessment of 476 urban housing.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3770
<b>Full Name</b>	Mr Anthony Warren
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	A 27% increase of homes by 2036 from 64,000 will change the character of the local too much meaning our towns will become cities. The plans for the whole of Hertfordshire should be set out to make sure there is fair distribution across the whole county.

	The projects don't consider brexit or the correct size of a family home which will affect the requirements. I would prefer a figure of 500 homes a year taking the above into consideration.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3778
<b>Full Name</b>	Mr James King
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The bare minimum. As it is the government whoever it is fails to meet its targets so why should DBC be trying to out do them.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3824
<b>Full Name</b>	Mr Michael Arrowsmith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The DCB figure for Urban Capacity of 476.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3841
<b>Full Name</b>	Mrs Suzette Phair
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Localised constraints within each area dictate what is a viable number to build... providing housing without sufficient school places, medical provisions, transport

	links etc., simply based on demand/formulas is not a realistic approach, when it will have a detrimental impact.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3937
<b>Full Name</b>	Mr John McCombe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Central Government should have the best overview of need and have no doubt built in a margin of error
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO3964
<b>Full Name</b>	Mr Tim Varley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The wide range of figures leads one to consider that there is a lack of credibility about them. What is certain is that they will all be wrong. However fundamentally important decisions are going to be made and if too higher a figure is chosen then land protected for the last seventy years is at risk of losing its protection for ever possibly for the wrong reason. However, if a figure has to established then the Government figure of 602 houses pa seems sensible but this should be the subject to regular review taking into account up to date information on actual demand and also windfall sites that may become available and have not previously been considered.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4028
<b>Full Name</b>	Mr R. Latham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia

	Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	Please see paragraph 2.28 and 2.29 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (23)</a>
<b>Number</b>	Question 16
<b>ID</b>	LP104047
<b>Full Name</b>	Mr Oliver Fairfull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>We need far less focus on targets, and more focus on sustainable growth. Building and growth can be a positive thing as long as there is careful planning and spending on the infrastructure of the towns and villages you are looking to expand. It is incumbent on you to ensure that the quality of lives of the existing resident in the county is not diminished, and throwing up housing to meet a target (however the number is derived) will not achieve that. The truth is, despite living in an affluent area, services are remarkably strained and under resourced. Doctors' appointments are booked up 2 weeks ahead, roads are busy and getting busier, refuse collection are already fortnightly, schools/nurseries are full.</p> <p>The trust is a large amount of the wealth brought into the county is from people working in London and we rely on an increasingly expensive and failing railway system. Station car parks are full, there is a severely limited bus service, cycle paths are non existent or neglected and dangerous. Roads are already busy and adding more traffic will impact our environment. It's easy to sell off our countryside and quickly build sprawling estates of cookie cutter housing, but how will things look in 10 or 15 years? Unless we fix the underlying issues it will be too late.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP104058
<b>Full Name</b>	Mr Graham Ford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I see no reason why the target should be increased for the Borough from that agreed in 2012. I see nothing that has changed in terms of feasibility. I do agree that the demand side of the equation has changed, especially for housing which our children can afford, however delivering into that requirement for me needs a different approach which is lead by the Government and Boroughs working together with the construction industry to identify brand new sites distinct from the infill sites proposed here with plans that deliver into all the requirements of housing need, employment realities, infrastructure demand, environmental aspirations and services/amenities needs. Clearly this will take longer than simply compressing housing into already overcrowded areas however, in the long run it will make far greater sense. Putting this approach off in favour of expedient and damaging in-fill planning will I fear simply repeat mistakes of the past.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP104074
<b>Full Name</b>	Mr M. Chester
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	Please see paragraph 2.28 and 2.29 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (39)</a>
<b>Number</b>	Question 16
<b>ID</b>	LP104080
<b>Full Name</b>	Miss D Bryant
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Less than 602 I am confused where do housing figures come from if Dacorum do not even have accurate waiting list numbers?



	I attended a Dacorum Council meeting in November one point raised; There are 10,000 people on the Dacorum Housing Register yet only 2,000 are actively looking for properties, we were asked how Dacorum should go about investigating the 8,000 to get an accurate figure?
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4086
<b>Full Name</b>	Ms wendy Roscoe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The lower figure per year is still quite a target to achieve but might be done so by not using our countryside
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4120
<b>Full Name</b>	Mr D. Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	Please see paragraph 2.28 and 2.29 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (55)</a>
<b>Number</b>	Question 16
<b>ID</b>	LPIO4130
<b>Full Name</b>	Mr Graham Hoad
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	More work is needed to arrive at a figure for Tring. There are geographic constraints; the canal, B488 & B4251

	which suggests a finite size for Tring unless considerations of AONB are ignored. There are deficiencies that need to be addressed before further expansion is considered. That is: Schools capacity, Railway Station access its facilities and parking, Town car parking, Social facilities and employment in town.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4286
<b>Full Name</b>	Mrs Caroline Hargrove
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The figure that is needed! Really needed The people paying huge amounts of charges to Dacorum every year work very hard for that money and it should only be spent on those really deserving
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4308
<b>Full Name</b>	Mr Bruce Morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I do not believe that it is acceptable for my councillors to set a number above that which is sensibly achievable given the constraints in the area. DBC have calculated this number as 476 new dwelling a year.If Green Belt release was excluded this number may be even lower. I believe that it is possible for councils to set a figure lower than the local housing need in certain circumstances. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to

	co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” I remain to be persuaded that DBC has done enough to challenge the numbers and gain credit for the St Albans banked East Hemel extension. The local housing need is only part of the evidence not necessarily the answer.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4345
<b>Full Name</b>	Mr Anthony White
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This is the government based figure that aims to satisfy the perceived need for housing Why would Dacorum want to over develop and overload the already strained infrastructure
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4362
<b>Full Name</b>	Mr Philip Homer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	A figure below any of those specified that is actually sustainable. So far we have seen no improvements to any infrastructure following any of the developments that have taken place at Apsley Lock, Nash Mills or the Ovaltine. We are always told that improved infrastructure will follow these developments but it never does. How about we acknowledge the fact that road, rail, water, healthcare, Drainage are all struggling following previous development and set the figure at an intentionally low level which can be increased at a point when developers and local authorities have made necessary improvements to the infrastructure. say 300.
<b>Include files</b>	
<b>Number</b>	Question 16

<b>ID</b>	LPIO4376
<b>Full Name</b>	Mr Adrian Bate
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The figure that corresponds to the brown field sites only.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4433
<b>Full Name</b>	Mr Robert Bailey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	If you build houses then people will move here but that is not the same thing as local need. My number is zero for Berkhamsted as I believe the right answer is to build one new large town and leave this local area and villages alone as they are already too large.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4475
<b>Full Name</b>	Mrs Alison Williamson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This will allow building to be done on Brownfield sites and not on Green Belt land
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4624
<b>Full Name</b>	Mrs Caroline Nickalls
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>The lower figure is the most realistic if the character of the towns and villages throughout the borough are to be preserved. Exceeding this figure would not be in tune with the area's capacity in terms of public services and infrastructure and, therefore, would not be sustainable.</p> <p>There would be an unavailable loss of green space which would result in the coalescence of villages and towns. Heavy road congestion, poor air quality, loss of biodiversity and more limited access to open green space would be unavoidable.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4629
<b>Full Name</b>	Ms Ann Davies
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>A 40% increase on the current housing target of 430 homes a year is already a significant increase and will be difficult enough to accommodate. Further increases will tax already oversubscribed schools and GP services, lead to blurring of village boundaries, loss of village identity and historic character, and urban sprawl. Building on Green Belt sites is not sustainable.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4634
<b>Full Name</b>	Miss Anna Nickalls
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Overambitious housing targets will inevitably lead to badly made, short lived developments without the infrastructure to support the increase in population. We</p>

	cannot only focus on what we "need" without also considering what is genuinely possible. It is not possible to increase South West Hertfordshire's population by thousands without dramatically altering the nature and individuality of every part of this area.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4663
<b>Full Name</b>	Mr Patricia Wheway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	It should be based on local need for demand from outside the area.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4684
<b>Full Name</b>	Mrs Maria Kennedy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4698
<b>Full Name</b>	Mr Keith Bradbury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	D) 476 Urban Capacity
<b>Include files</b>	
<b>Number</b>	Question 16

<b>ID</b>	LPIO4710
<b>Full Name</b>	Mr Andrew Criddle
<b>Company / Organisation</b>	Tring Sports Forum
<b>Position</b>	Vice Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4745
<b>Full Name</b>	Mr Andrew Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	South West Hertfordshire is already congested. Schools are at capacity and nowhere within the planning documents have I seen discussion around providing adequate quality schools.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4797
<b>Full Name</b>	Mrs Sara Cooke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This part of Hertfordshire is already at capacity. Berkhamsted has already exceeded its housing build rate, this should be taken into account for how many we "need" to build going forward.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4823
<b>Full Name</b>	Dr Jane Leithead

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This is the better option with regard to avoiding destroying greenbelt sites, and avoiding over-stretching the already struggling road system in Kings Langley.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4863
<b>Full Name</b>	
<b>Company / Organisation</b>	Watson Howick
<b>Position</b>	
<b>Agent Name</b>	Mrs Julia Riddle
<b>Company / Organisation</b>	Castle Planning
<b>Position</b>	Director
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<p>Question 16 asks which housing figure is the most reasonable starting point. In the context of Question 15, there remains uncertainty at the current time as to the government's expectations in terms of housing numbers, as a result of the recent consultation in relation to 'Planning for the Right Homes in the Right Places'.</p> <p>The SHMA produced suggests a figure of 728 additional homes per annum, which has been increased to 756 on the basis of market signals in relation to likely housing need and demand.</p> <p>The formulaic calculation set out in the government's recent consultation document has already been subject of some concern from a number of Local Authorities in terms of the impact it would have on their housing numbers and therefore the pattern and extent of resulting growth in their local area. It is vital that Local Authorities plan realistically for growth, but also that growth is balanced against other factors, for example the timing of infrastructure delivery.</p> <p>The Government's formulaic approach to the calculation of housing numbers allows for Local Authorities with an up to date Local Plan (less than 5 years old) to retain a lower figure for housing growth at present. The higher figure for Dacorum, of around 1,100 homes per annum, which would become applicable after the Plan was over 5 years old, would have a significant impact on the pressure for development in the local area.</p>



	<p>Any of the figures set out would require a substantial increase in the extent and rate of development currently and recently being experienced.</p> <p>The question asks what the most reasonable starting point is for housing growth. At present, the status of the Government's consultation document means that it is unknown as to what the final outcome and resulting requirement will end up being and therefore what will be required of Local Authorities in their Local Plans in this context. It is clear, however, that any approach is likely to require a higher housing number than that which is in the current Plan. Ultimately, therefore, the new Local Plan should robustly plan for this and identify adequate land to accommodate this growth, in order to avoid the requirement for another early Plan review, which would cause ongoing uncertainty to developers and land owners and also so that adequate infrastructure to facilitate this growth can be planned for and delivered in a timely manner.</p> <p>The lower and upper figures cannot be supported on the basis that they are formulated on the basis of a consultation document, which, although it is recognised in final form may dictate the formula which should be used for setting housing growth figures in local areas, at this stage is inappropriate to use on the basis of the early stage of its preparation and the uncertainties as to the outcome of consultation and impact this will have on the final version of this document. It is therefore premature to use these figures at present.</p> <p>As such, we support the figure of 756 homes per annum, on the basis that it is formed on a quantifiable assessment of need and demand. The Plan should however be able to identify flexibility in the delivery of these figures. This should also be in accordance with the NPPF, which requires that a Local Authority should identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements with an additional buffer of 5%.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO4895
<b>Full Name</b>	Mr Simon Scott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>d) Another figure - 476 The DBC figure for Urban Capacity.</p> <p>I quote Mr.Case's response as I fully support it:          "I do not believe it is reasonable to set a housing target above numbers achievable considering all the constraints</p>

of the area, which DBC have calculated to be 476 new dwellings per year. I support BRAG's contention that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.

The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

	<p>DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <p>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. Please note for the sake of clarity, I am not proposing that adoption of the plan should be left to the last possible date but simply offer it as an example</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP104957
<b>Full Name</b>	Ms Lynn Riley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>602 homes a year. The draft figure is acceptable by Government and should be achievable and realistic for the area. It's still a lot though!</p> <p>Hemel Hempstead is already gridlocked at most times of the day, and especially rush hour, from current residents, so a low start target for housing should be the starting point.</p> <p>I live in Piccotts End, and I'm very worried that I am about to be surrounded by new homes as a quick option purely because I am surrounded by unbuilt up land. There are still brownfield sites to utilise and there are still peripheral sites to utilise to complete current developments without encroaching on the precious beautiful countryside.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP104965
<b>Full Name</b>	Janet Pitts
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	We should stick with the figure of 476 as calculated by DBC which represents growth while not overwhelming our towns and villages with large scale development. We need to avoid building on Green Belt at all costs. Once lost we can never get it back.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP104988
<b>Full Name</b>	Mrs Nicola Botha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Yet other surveys suggest that local plans set a lower need.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP104991
<b>Full Name</b>	Mrs Rose Arrowsmith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Below 500 houses per year - although this is lower than suggested in Option a -( 602 Homes per year) DBC should be able to set their targets according to local need and ability to enhance the infrastructure to cope with new housing, rather than in accordance with central governments wishes to accommodate Londons housing shortfall!
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP105027
<b>Full Name</b>	Mr Chris Lumb

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The figure that should be used is that which is reasonably achievable, and my understanding is that DBC have calculated this to be 476 houses a year.</p> <p>Dacorum should pay due heed to what is said in the recent Department for Communities and Local Government document entitled "Planning for the right homes in the right places: consultation proposals", in which Paragraph 9 says: <i>"Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to cooperate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need."</i> In relation to the situation in Dacorum, St Albans is proposing to build housing at Gorhambury Estate, immediately to the East of Hemel Hempstead - even giving it the name of 'East Hemel Hempstead', and the people who would live in this development would be most likely to regard Hemel Hempstead as their 'local centre' for shopping, leisure, etc. The number of properties built there by St Albans should therefore be counted as being part of the development of Hemel Hempstead, and thus taken account of in deciding how many additional houses Dacorum will need to build.</p> <p>Given that the highest figures mentioned - those in Paragraph 6.1.14 - are disputed by Dacorum as being unrealistic, it has to be assumed that these 'highest' figures have been included in this consultation as a 'scare tactic' and should therefore be completely ignored for the current purpose. (If the intention in including these figures has been to try and encourage citizens to agree to a figure that is lower than the 'highest' ones, but still higher than what is reasonable, it seems to be an unreasonable and even an unfair tactic.)</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5086
<b>Full Name</b>	Dr Oliver Pengelley
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Given the overwhelmingly rural character of Dacorum, it appears most appropriate to use the figure of 602 houses per year. That said, even this appears too high, without a significant upgrade to local transport networks and parking - particularly in town centres - appears an insurmountable issue. It is hard to see how the new vision outlined at the start of the local plan can be realised when so many houses have to be built, with the inevitable pressures on local infrastructures.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5091
<b>Full Name</b>	Mr John Wood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5210
<b>Full Name</b>	Mr Gareth Morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The urban capacity of 476
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5211
<b>Full Name</b>	Mr Gareth Morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The urban capacity of 476
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5248
<b>Full Name</b>	Mrs Catherine Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	The government's draft formula is open to question, and the need for 1000 homes a year assumes present economic growth and immigration. This may well fall depending on the Brexit outcome
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5269
<b>Full Name</b>	Mr Gary Ansell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The options are all models so and the situation may change, therefore the lower figure of 602 homes is the right starting point for the target.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5319
<b>Full Name</b>	Miss Giulietta Cinque
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>No account is taken of actual capacity. There is no justification for building on Green Belt land. The future housing demand is a forecast behind which there are many assumptions, many of which will change over time.</p> <p>Massive developments have already been completed, Ovaltine, the Marina, Nash Mills. We should try to build the lowest number possible going forward.</p> <p>The impact on Kings Langley and its residents if more than 602 homes a year are developed is significant. Heavy road congestion, poor air quality, over-subscribed schooling and healthcare, limited access to open green space, coalescence with neighbouring towns and villages and an irreversible impact on the village's culture and heritage would be unavoidable.</p> <p>As I've mentioned elsewhere, this area borders with Three Rivers, so it cannot be considered in isolation without taking that area and its plans/options into account too. Note Ovaltine, where a significant number of new dwellings have already been added to the housing stock of Kings Langley. Maybe there are brownfield sites in their area which could be utilised? What liaison are DBC undertaking with Three Rivers in order to ensure everything is taken into account over the WHOLE area, and is a unified approach being adopted?</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5383
<b>Full Name</b>	Mrs J Nathan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	It makes sense to me to meet the Government's requirement, whilst striving to protect our landscape.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5384
<b>Full Name</b>	Mr Reuben Bellamy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula



<p><b>Your response - Please add your response here</b></p>	<p>The most appropriate figure of housing need to use as a starting point is the 1000- -1100 a year figure from the Government's draft standard formula.</p> <p>The LPA's concern about the step change in delivery this will represent is noted. It is also the case that this figure is higher than the SHMA derived figure of 756. However, there are reasons why such a step change is needed. It is useful to consider the National Infrastructure Commission (NICS) report into the Cambridge to Oxford Arc called 'Partnering for Prosperity'. The report paints a familiar picture of the difference between average earnings and average house prices within the arc and the problems of staff recruitment for services and businesses related to housing difficulties. This picture is familiar and relevant to Hertfordshire. The report states; "These estimates of housing need exceed local estimates of objectively assessed needs developed by local authorities through their Strategic Housing Market Assessments. These assessments estimate housing need across the arc at 20,135 homes per year. This discrepancy should not be a surprise – there is good reason to believe that the methodology used in undertaking assessments of local housing need can be conservative and can mask high levels of unmet need. Although local authorities are not consistent in their approach to calculating need, many use trend based household projections which are based on recent migration trends. In many cases historic migration has been suppressed by low housing supply, leading to underestimates of migration in areas with high levels of demand and growing housing needs. This is a national issue, but of particular relevance to the study area given high levels of demand for housing.'</p> <p>In addition, it is highly likely that the new standardised methodology will be introduced and there will be a requirement to use it.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 16</p>
<p><b>ID</b></p>	<p>LPIO5444</p>
<p><b>Full Name</b></p>	<p>Mr Padraig Dowd</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Housing numbers - Please provide your chosen option</b></p>	<p>d) Another figure (please specify).</p>
<p><b>Your response - Please add your response here</b></p>	<p>100 new single properties.</p> <p>Little data exists to show the type and user of additional properties which is tied in with changes to the existing stock due to demographics. Then, it seems no account has been taken of redevelopment of existing properties including vacated business premises in central areas. Finally, you have not considered the re-purposing of existing properties and incentives to do so. Simply</p>

	building new standard houses by itself does not address new accommodation needs; the data needs to be gathered and analysed holistically.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5465
<b>Full Name</b>	Mr Garrick Stevens
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>A</b> <i><b>The Borough [and DCLG] should be quite clear to distinguish between ‘need’ and ‘demand’.</b></i></p> <p>The SHMA identifies the quantum of Objectively Assessed Need for <i>affordable homes</i> as 366 pa [see Table 43 page 129, Intermediate 108/Social 258 Total 366]. This compares with the OAN total of 756 pa implying the <i>demand</i> for open market dwellings is 390 pa.</p> <p>If the policy priority is to build to meet the <i>need</i> for <b>affordable</b> homes, these could be accommodated within the prevailing target of 430 pa, viz per the Core Strategy adopted September 2013, and <u>without</u> the release of sensitive areas in the Green Belt.</p> <p><b>B</b> However, recognising the DCLG guidance in September 2017, and the likelihood of conflict with DCLG policy, the Borough would be prudent to consider how best to accommodate new build with minimal impact on Green Belt release, based on:</p> <p><b>a) A maximum cap of 602 as per the Government’s draft figure</b></p> <p><b>C</b> Growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints, particularly infrastructure, as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <p>As an example of the variance among predictions, the report Dacorum Strategic Infrastructure Study [Feb. 2011] shows a <b>decline</b> in Berkhamsted’s population beyond 2021.</p> <p><b>D</b> <i>In paragraphs 6.2.7 and 6.2.8 it is made abundantly clear, when developing the current Core Strategy, that anything over the current housing target [in Berkhamsted (1180 for 2006 – 2031)] could not be sustained on infrastructure grounds.</i></p>
<b>Include files</b>	

<b>Number</b>	Question 16
<b>ID</b>	LPIO5504
<b>Full Name</b>	Mrs Margaret Stanier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This should be sufficient to address local housing need, as specified in the plan objectives.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5514
<b>Full Name</b>	Ms Geraldine Whiteside
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	No housing development should take place in what is currently designated green belt. None of the Kings Langley sites mentioned in the plan, including Shendish, are acceptable because they are in the green belt.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5579
<b>Full Name</b>	
<b>Company / Organisation</b>	Village Foundations
<b>Position</b>	
<b>Agent Name</b>	Mr Nick Wyke
<b>Company / Organisation</b>	Gade Group
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	Part C and the figure of 1000 to 1,100 homes a year is the most appropriate figure to use as the starting point when setting housing targets for the draft Dacorum Local Plan. Should the government's proposed formula that forms part of the consultation document 'Planning for the right homes in the right places' be adopted, those

	local authorities with a core strategy of 5 years or older (which would include Dacorum) would be required to provide 1,000-1,100 homes a year. Should Dacorum be required to take some of London's Housing Needs as referred to in paragraph 6.1.16 then the housing growth targets would be required to be amended and new sites found to accommodate this new need. Progressing with a local plan that does not accurately take into account the long term housing would risk the housing delivery targets contained within the draft local plan being found unsound at a later stage. Further amendments and updates to the draft local plan would therefore be required and risk insensitive development from coming forward in inappropriate locations whilst the local plan is being updated.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5580
<b>Full Name</b>	Mr Michael Ridley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Housing targets should primarily be informed by demand for social housing
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5583
<b>Full Name</b>	Mr Michael Ridley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Housing targets should primarily be informed by demand for social housing
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5608
<b>Full Name</b>	Mrs Christine Cosgrave
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5640
<b>Full Name</b>	Mr Nigel Vanner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	500, in other words approx. mid way between the current Core Strategy and the draft Government targets. The current government wants to significantly increase the rate of building, however with the delay and long lead times already being experienced with some building materials, (and likely to worsen with increased demand) it is unlikely that ambitious housing targets will be achieved.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5677
<b>Full Name</b>	Mr Alastair Greene
<b>Company / Organisation</b>	Little Gaddesden Parish Council
<b>Position</b>	Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5738
<b>Full Name</b>	Dr Lucy Murfett
<b>Company / Organisation</b>	Chilterns Conservation Board
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>The NPPF explains at para 14 that Local Plans should meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and unless specific policies in the Framework indicate development should be restricted. Examples of areas where development should be restricted are listed in footnote 9 of the NPPF. They are abundant in Dacorum BC, where there are Special Areas of Conservation, many sites designated as Sites of Special Scientific Interest, significant areas of land designated as Green Belt and Area of Outstanding Natural Beauty, designated heritage assets; and locations at risk of flooding.</p> <p>The process of establishing the housing requirement should involve taking the OAN figure and assessing capacity and constraints so that the figure is, if necessary, reduced. The capacity for development in landscape and environmental terms in Dacorum should establish the appropriate number. There is no evidence in the plan that this taken place, we are just being asked to select which OAN figure we favour as the starting point. The diagram in the plan shows OAN followed by a cog for testing housing growth options, including land designations like Green Belt and AONB, land availability information, local infrastructure capacity, SA, and feedback from consultation. This testing process needs to happen and the consultation should be asking what is the appropriate level of growth, not which OAN figure to use as a starting point.</p> <p>The Chilterns Conservation Board agrees with the conclusion in the SA Working Notes that the higher the level of growth, the greater potential for adverse effects. This could include</p> <ol style="list-style-type: none"> <li>1. more water abstracted to serve development from Chilterns chalk streams (a globally rare habitat and already none in Dacorum are in good health, mainly because of low flows from over-abstraction)</li> <li>2. loss of natural beauty</li> <li>3. "nibbling" of development at the edge of the AONB</li> <li>4. increased recreation pressure on honeypot sites like Ashridge</li> <li>5. nitrogen pollution from vehicle emissions affecting plantlife, especially the habitats of the Chilterns Beechwoods Special Area of Conservation.</li> </ol> <p>The Chilterns Conservation Board has recently produced guidance in a Position Statement on Cumulative Impacts of Developments on the Chilterns AONB which should be of assistance in identifying effects and assessing them, it is available online at <a href="http://www.chilterns.gov.uk/boards/development/position-statement">http://www.chilterns.gov.uk/boards/development/position-statement</a></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5751

<b>Full Name</b>	Mr Quentin Ross-Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Less than 602 per year to meet infrastructure needs.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5792
<b>Full Name</b>	Mr Brian Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5845
<b>Full Name</b>	Mr Keith Crawley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The governments housing figures are severely flawed and local authorities will be unable to hit the unreasonable targets imposed upon them, therefore unsuitable sites will be passed due to lack of a 5 year supply. Green belt land will be lost due to this, and unfortunately Tring will become another Bishops Stortford ie. a small market town centre surrounded with suburban sprawl leading to a loss of identity. The large allocations that are required to meet such high targets will result in PLC development of similar looking housetypes with little character. This is not the way forward in my view. If the targets were reduced a more sensitive form of development can be employed, but unfortunately this will not be the case.
<b>Include files</b>	

<b>Number</b>	Question 16
<b>ID</b>	LP105859
<b>Full Name</b>	Mr Michael Lelieveld
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>a) 602 (maximum cap)</p> <p>We would note that there is no nationally agreed methodology for calculating housing need and we welcome the Council scepticism about the Government's proposed formula (set out in 6.1.15). We would ask that the Council revisit this during the next phase of the process and set out how its calculations are evidenced and objective.</p> <p>As noted above, development in Berkhamsted is significantly ahead of target while other parts of Dacorum – especially Hemel – are behind target. Additionally, schemes that are already approved but not yet built will go a long way towards meeting targets. The Council must take these schemes in to account when setting new targets. Lower numbers of new dwellings should therefore also be considered alongside the options set out in this question.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP105878
<b>Full Name</b>	Mr Grahame Partridge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> </ul>
<b>Include files</b>	



<b>Number</b>	Question 16
<b>ID</b>	LPIO5951
<b>Full Name</b>	Ms Fiona Coulling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Development needs to be delivered at a sustainable pace. In order to reach the levels when additional contributions are required by developers, this should be considered over the life of the plan rather than on an annual basis.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5980
<b>Full Name</b>	Steve Pitts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	The housing need is difficult to quantify but it is the type of housing that really needs to be addressed. In an area like ours the developers want to build homes from which they can make the most money but what the area needs is affordable housing for the current twenty-something generation and the new generations after that. Building more homes in Dacorum is only going to precipitate an influx that our infrastructure (including roads, schools and healthcare provision) are simply unable to accommodate.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO5988
<b>Full Name</b>	Mr Paul Craig
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6000
<b>Full Name</b>	Mrs Pauline Hughes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6022
<b>Full Name</b>	Mr Chris Gee
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Lower figure please. New housing provision will be accepted & occupied at whatever level of new units are produced
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6024
<b>Full Name</b>	Mr Julian Cacchioli
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	476 The DBC figure for Urban Capacity. <ul style="list-style-type: none"> <li>I do not believe it is reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have</li> </ul>

calculated to be 476 new dwellings per year. I support BRAG's contention that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of

	<p>capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. Please note for the sake of clarity, I am not proposing that adoption of the plan should be left to the last possible date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6045
<b>Full Name</b>	Georgina Tregoning
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6140
<b>Full Name</b>	Mrs Rebecca Giddings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP106226
<b>Full Name</b>	Mr Andrew Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The lower figure is the best approach. Your draft figure of 602 homes a year was already a 40% increase on your previous housing target of 430 homes a year. By keeping to your original figures you can avoid the unnecessary building on green belt to keep traffic at its current levels and protect our wonderful surroundings
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP106254
<b>Full Name</b>	Mr Dalton
<b>Company / Organisation</b>	Land and Partners Limited
<b>Position</b>	Project Planner
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p>Option C is the most reasonable starting point as it will be the requirement according to the Government's draft standard formula. The plan is scheduled to be submitted after the Core strategy turns 5 years old. As paragraph 6.1.14 states, the figure of 1,000 to 1,100 would need to be used after the plan is 5 years old. Therefore the latest available evidence suggests 1,000 to 1,100 would be the most sound figure to use as a starting point.</p> <p>Clearly each settlement has to be assessed in terms of its capacity. Land and Partners controls land at Markyate outside of the Green Belt and AONB (My-h2 Land at Pickford Road) and this is one example of a location where growth can be accommodated sustainably.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP106271

<b>Full Name</b>	Miss Lucy Muzio
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Hemel is already at capacity, instead of building new homes stop building private rents and letting landlords overcharge for them people might be able to afford to rent without the need for so many social houses to be built.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6273
<b>Full Name</b>	Ms Ann Hetherington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>&lt;p&gt;I don't feel qualified to provide a figure but I hope you are also taking into account the huge housing development in the Aylesbury area which will effect housing demand in Tring.&lt;/p&gt;</p> <p>&lt;p&gt;We may also be coming into a period of economic decline so the higher figures may be unrealistic.&lt;/p&gt;</p> <p>I would prefer the council to work to low figures until the actual housing need in the planned areas is established and there is a plan for supporting infrastructure to be developed at the same time..</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6342
<b>Full Name</b>	Mr Nicholas Ring
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6369
<b>Full Name</b>	Dr Melvyn Else
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6439
<b>Full Name</b>	Mrs anna silsby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The figure should remain at 430 a year. First of all the Housing Market Area definition should be altered as per my previous comment. Hemel Hempstead should be separated out from the rest of Dacorum. Secondly, the Maylands business estate is a large source of the local job growth. However most of the workers there commute and also come in from North of HH. There specific jobs should be excluded from the calculation to properly reflect the local impact of small and local businesses driving job growth.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6466
<b>Full Name</b>	Prof Timothy Blinko Blinko
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year

<b>Your response - Please add your response here</b>	This is reasonable amount of development for this already densely populated area. The proposals to build on HH-h2, and HH-h1a are completely unacceptable as they would destroy any meaningful sense of the Piccotts End conservation area. I agree with the Stage 2 Green Belt Review and Landscape Appraisal conclusions to reject these 2 developments as cited in evidence below.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6530
<b>Full Name</b>	Mrs Tim Blinko
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This figure is sustainable without destroying beautiful historic greenbelt land which make Hemel beautiful.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6544
<b>Full Name</b>	Mr Stephen Clarke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6573
<b>Full Name</b>	Mrs Tim Blinko
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year



<b>Your response - Please add your response here</b>	This is the only acceptable figure, others are excessive.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6580
<b>Full Name</b>	Mrs Gemma Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6587
<b>Full Name</b>	Mr Andrew Lambourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	This should be the starting point and an absolute cap of 756 if this is not accepted.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6588
<b>Full Name</b>	Mr Patrick Walsh
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	475 over 23 years unless infrastructure is developed and brownfield sites utilised. Green belt land must be protected.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6654

<b>Full Name</b>	Ms C Oxer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6686
<b>Full Name</b>	Mr Nick Hollinghurst
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Based on draft government figures with the emphasis on Hemel Hempstead to give a Tring figure remaining at 500. My reason for this is scepticism that the increased demand is justified at all - because current conditions, future difficulties and any form of government national regional policy have all been wrongly neglected.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6720
<b>Full Name</b>	Mr Geoff Latham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	Of the options provided this is the maximum available choice. Government figures are notoriously inaccurate and it is quite likely that they could be on the low side. Apart from natural growth and immigration, there is a large number of people excluded from the housing market because of the cost of purchasing freeholds and having to pay high rents in the meantime. In this respect Government policy is probably not the correct answer. Subsidising a relatively few qualifying individuals for vote

	<p>appeal is unfair to existing owners and those who do not qualify. The subsidies will probably not help the targets by driving up the cost of houses, Certainly, a vendor would probably want to take 50% of any subsidy and stamp duty saving, if not all of it. The root cause of the problem is the scarcity of homes where they are wanted, largely by green belt and restricted development control.</p> <p>In any event, mention of provision by a formula smacks of bureaucracy rather than a consideration of need. The starting point should be a consideration of all the land available in the region required to satisfy local and regional needs. Allocating land considerably in excess of the likely requirement would reduce prices to the level where the demand was satisfied due to competition between land owners to sell. Demand would also gravitate to those areas providing better services and environment giving an incentive to these being provided.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6771
<b>Full Name</b>	Andrea Bartlett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6828
<b>Full Name</b>	Mr Alan Horn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	However many homes are built each year there is a desperate need to improve infrastructure just to support current levels. A high level of affordable homes need to be included within any development.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6830
<b>Full Name</b>	Mr Graham Smith

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	A limit must be put on housing development especially when you consider Aylesbury's development and the growth of Halton/Wendover/Aston Clinton. The A41 must not be turned into an urban corridor.
Include files	
Number	Question 16
ID	LPIO6853
Full Name	Mrs Susan Richards
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states " <i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i> " DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject

	to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6896
<b>Full Name</b>	Bradford Gunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	a) represents a dramatic increase over what Dacorum is currently capable of providing, the 756 homes per year is not sustainable, as such Dacorum and its residents should not be required to compensate for the London and Welwyn/Hatfield shortfall.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6924
<b>Full Name</b>	Mrs Jenna Selby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	476 with no impact on Green Belt land
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6940
<b>Full Name</b>	Mr John Richards
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new

	<p>dwelling per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO6989
<b>Full Name</b>	mr michael hicks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I accept that developers will not pay for infrastructure until they get money flowing in from their development. That creates a short term strain on infrastructure. Plans should be made to guarantee the payments even if the developer goes bankrupt or has some other excuse for not paying.</p> <p>That dictates the following example</p> <p>Tring could accommodate 300 or 400 more houses once the infrastructure for LA5 and the other already planned houses has been put into place. This 300 to 400 will then stretch the new infrastructure to breaking point and can only be accepted if there is a guarantee that the new infrastructure will be built</p>

	<p>Without added infrastructure LA5 will cause a disaster for schools doctors dentists sports and youth clubs. Once this infrastructure is in place there is scope for more houses if more infrastructure goes with them</p> <p>No more homes should be built until the LA5 infrastructure is in place and firm plans for the next level of infrastructure</p> <p>In this way tring could take 300 to 400 I assume berkhamstead which is bigger could take 500 to 800 Hemel 2000 to 2800 bovingdon kings Langley and markyate 600 to 800 That gives a total of 2900 to 4800</p> <p>even that is pushing all the infrastructure</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7060
<b>Full Name</b>	Mrs Gillian Lumb
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>D) 476 Urban capacity</b></p> <p>Figures from the Gorhambury development should be included.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7106
<b>Full Name</b>	Mr & Mrs Fox
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation.

To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.

However, we would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG RESPONSE TO Q16 (FULL DOC ATTACHED TO Q46)

Question 16

Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

D) 476 Urban Capacity

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476

underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at



430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.

The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to cooperate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt. One of the biggest driving factors for increased housing stock is the decreasing average number of residents per

household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.

6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old.

The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7317
<b>Full Name</b>	Brian and Heidi Norris
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>We fully understand the need for additional housing in this country, but it should not be to the detriment of towns such as ours. We do not intend to reply to the 46 questions one by one, but support the answers given by the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group and support Option 1B in the Strategy Plan. Even this number of 600 further homes is, in our view, more than enough, but we understand that is an existing commitment.</p> <p>BRAG response to Question 16 (please note full document is attached to Q46)</p> <p>Question 16</p> <p>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p>D) 476 Urban Capacity</p> <p><input type="checkbox"/></p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</p> <p><input type="checkbox"/></p> <p>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt</p>

etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector

suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring

regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places:

consultation proposals" with paragraph 9 stating that " *Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this*

housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural

Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities –through the duty to cooperate

–to determine how any need that cannot be accommodated will be redistributed over a wider area. This means

that the level of housing set out in a plan may be lower or higher than the local housing need

."Notwithstanding the fact

that BRAG has grave reservations about the methodology in the SHMA which calculated DBC 'locally assessed need'

BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly

given the Governments recent strong commitments to preserving the Green Belt.

□

One of the biggest driving factors for increased housing stock is the decreasing average number of residents per

household and as argued in previous submissions the decline in household numbers has not progressed at the level

previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example,

simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036

would bring the SHMA 'locally assessed needs' down to the 'raft Government numbers' In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the

recognised constraints as should the allocation of development. It should be recognised that predictions of need are

	<p>subject to quite large margins of error given the various assumptions on which they are calculated.</p> <p><input type="checkbox"/></p> <p>DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <p><input type="checkbox"/></p> <p>6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum' plan once it becomes more than 5 years old.</p> <p>The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7371
<b>Full Name</b>	Mrs Helen Harding
<b>Company / Organisation</b>	Chiltern & South Bucks District Council
<b>Position</b>	Principal Planner
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	Thank you for consulting Chiltern and South Bucks District Council and for your continuing engagement on Duty to Co-operate matters with the Councils in relation to the emerging Dacorum Plan and the joint Local Plan Chiltern and South Bucks.

	<p>I attach the response of Chiltern and South Bucks District Council on your reg 18 Issues and Options consultation. The response has been agreed with the Chiltern District Council Portfolio Holder for Sustainable Development, Councillor Peter Martin.</p> <p>The response of the South Bucks District Council Portfolio Holder for Sustainable Development, Councillor John Read is currently awaited at the time of sending this email. If there are any changes to this response in the light of comments which he may wish to make I will contact you straight away.</p> <p>The Councils support the use of a target based on the current local evidence for Dacorum BC until it is superseded i.e. 756 dwgs a year based on the SHMA (option b). This is because the SHMA is the latest available finalised indicator of needs and as the outcome of the NPPF OAN consultation is not certain.</p> <p>Full document attached to Q46</p>
<b>Include files</b>	

<b>Number</b>	Question 16
<b>ID</b>	LPIO7466
<b>Full Name</b>	MR Christopher Kendall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Answer – d) 500 a year</p> <p>I have no confidence in the accuracy of any of the short term assessments and trying to project conditions that will be prevail in 20 years' time is in my view a complete waste of time and money.</p> <p>To suggest that I am able to accurately quantify the reasonableness or otherwise of any of the "assessments" is an absurdly over-optimistic view of any individual's ability. I have suggested a relatively modest round number as the most reasonable because our Borough is already sufficiently developed. This number is higher than the current housing target (430) and above the Urban Capacity figure (476). I am particularly concerned by the large-scale development options for Green Belt land in Tring and Berkhamsted. That is not to suggest that there will be opportunities for small-scale brownfield sites and local infilling for modest expansion but major housing and infrastructure development should be accomplished by major new town initiatives.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7506
<b>Full Name</b>	Harriet Twigger
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	I consider the number of houses recommended in Option 1 to be the best option. This number meets the government requirement and is the most reasonable starting point
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7512
<b>Full Name</b>	Annette Harrison

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	<b>My answer is 'I recommend Option 1.' This lower figure satisfies the nation's need.</b>
Include files	
Number	Question 16
ID	LPIO7518
Full Name	Paul Harrison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	<b>My answer is 'I recommend Option 1.' This lower figure satisfies the nation's need.</b>
Include files	
Number	Question 16
ID	LPIO7553
Full Name	David Reavell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	The most realistic figure is a) 602.
Include files	
Number	Question 16
ID	LPIO7562
Full Name	Fiona Reavell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	



<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The most realistic figure is a) 602.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7677
<b>Full Name</b>	JUNE LIGHTFOOT
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	1 D) 476 Urban Capacity 476 is possible within the framework of 'urban capacity'. Best to start with a figure for housing need, then revise it downwards for reasons of Green Belt, AONB, SSI etc
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7697
<b>Full Name</b>	MR & MRS MP & ME HARNETT
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<i>The Government's draft figure of 602 homes a year</i>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7738
<b>Full Name</b>	Mr Bruce Nixon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

<b>Your response - Please add your response here</b>	<b>Government should not be imposing housing targets on us.</b> This process too is undemocratic. Boroughs and towns should be deciding what their housing needs are. Affordable homes are the greatest need and developers cannot provide them and make a profit. Developers have built almost no affordable homes. Affordable housing to rent will only be delivered by local councils. Government policy does not enable local government to borrow in order to do this.  Nevertheless I appreciate that you have to respond to government.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7858
<b>Full Name</b>	Dr Peter Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO7942
<b>Full Name</b>	Mr Norman Groves
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I would like to confirm that I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. BRAG RESPONSE TO Q16 D) 476 Urban Capacity <input type="checkbox"/> It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at

430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.

□

The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target.

They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to cooperate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

□

One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

□

DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.

□

6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old.

The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

**Include files**

Number	Question 16
ID	LP107992
Full Name	Mr Michael Nidd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p><b>1 D) 476 Urban Capacity.</b></p> <p>It is neither reasonable nor appropriate to set a housing target above what is achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. DBC quoted urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</p> <p>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that reassessment to be completed as part the early review. <b>However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target.</b> They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places" consultation proposals", whose paragraph 9 states that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to cooperate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>"</p> <p>There are well-founded reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', and a confusion between need and demand – the latter being almost completely driven by the volume house-building industry. The constraints of the Dacorum area mean that the Urban Capacity has</p>

	<p>to be the starting point, particularly given the Governments very recent strong commitments to preserving the Green Belt.</p> <p>The draft plan paragraph 6.1.14 is dangerously misleading. The Government consultation referred to above does NOT indicate that the larger figure (1,000-1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. Its inclusion seems somewhat revelatory of Dacorum planners' mindset.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8066
<b>Full Name</b>	Hertsmere Borough Council
<b>Company / Organisation</b>	Hertsmere Borough Council
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>Q.16 – Housing need</b></p> <p>In terms of the choice of targets and how you will seek to meet them, the approaches will need to be agreed though on-going joint working and in a Statement of Common Ground with the HMA/FEMA authorities. The recognition of the close link between numbers of new homes and jobs targets and the need to keep this under review in preparing the Local Plan is welcomed.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8382
<b>Full Name</b>	Mrs Sarah Rees
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p>

However, we would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the

housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green

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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT



	<p>indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8398
<b>Full Name</b>	Helen & Stuart Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action group have responded in full to the issues and options consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation the we wish DBC to duplicate BRAG's responses under our name.</b></p> <p><b>However, we would like to take this opportunity to emphasize just a few of the most important points within that response</b></p> <p>The number of proposed houses can only be determined once suitable sites have been ascertained, not the other way around.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper</li> </ul>

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	<p>Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> <li>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8413
<b>Full Name</b>	Spencer Holmes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are</i></p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8470
<b>Full Name</b>	Mr Peter Shell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Because of the above I am not in a position to myself provide detailed answers to all the questions, but have seen the response prepared by BRAG and agree with their comments which should also be regarded as my own.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient</i> </li></ul>

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**Include files**

Number	Question 16
ID	LP108476
Full Name	Mrs Pat Berkley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG's responses under my/our name. However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p>



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- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1

	<p>person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8494
<b>Full Name</b>	Mr Lawrence Sutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p>

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints

which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation

	<p>paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8661
<b>Full Name</b>	MRS G RUSSELL
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>No.</p> <p>d- Another figure.</p> <p>1- Should be less, or Government draft of 602 pa, but only if this can be achieved without using Green Belt, Rural areas, or destroying villages or small towns like Tring.</p> <p>2- Should prioritise safeguarding of the Green Belt as a constraint, before considering the housing target.</p> <p>3- Need is not the same as demand. See comments under Q9.</p> <p>4- The economic forecast has changed, so growth will be much less, and there will be less need for employment areas.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8700
<b>Full Name</b>	MR NIGEL EGERTON-KING
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The lowest growth target should be used in view of the constraints here at Berkhamsted referred to elsewhere

	in this response and the amount of development that has already occurred or is in the pipeline.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8869
<b>Full Name</b>	mrs susan stier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Rejected options should be re explored
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8958
<b>Full Name</b>	barney greenwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>1 D) 476 Urban Capacity</p> <p>This target is a full 11% higher than the 430 in the current Plan, and even that figure called for Green Belt release. But 476 is possible within the framework of 'urban capacity'. Also, DBC is not exploiting the freedoms it has to start with a figure for housing need, then revise it downwards for reasons of Green Belt, AONB, SSI etc. Even the Inspector was repeatedly stressing that the need figure does not dictate the housing target figure. DBC's mechanistic approach here is causing unnecessary harm, doing both itself and its citizens down. If it really wants to be inflexible, it should instead make sure east Hemel is included in DBC targets despite resistance from St Albans.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO8990
<b>Full Name</b>	David Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	476 Urban Capacity
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9015
<b>Full Name</b>	Mrs Susan Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	1 D) 476 Urban Capacity
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9129
<b>Full Name</b>	Miss Jane McCLELLAND
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	I believe that Option 1 is the preferred option
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9161
<b>Full Name</b>	S Langley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have

	<p>calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9191
<b>Full Name</b>	Mr and Mrs Alan Bickerton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The councils throughout the country should be developing areas further away from the Southeast which are in need of regeneration to give opportunities to the areas where unemployment is the highest so as to give the people in those areas sustainable employment.</p> <p>Not so long ago those wanting their own house and work moved to where they could get work and buy a property, so why are we concentrating on more and more houses and employment in the Southeast when the Midlands and the North of the country need it far more and where people will be able to afford their own house.</p>



	<b>If it is the government or your own council that is pushing this policy of more houses in our area then you need to tell them of this kind of feedback and propose that this area builds less houses not more.</b>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9332
<b>Full Name</b>	MR AND MRS EDWARD AND ANGELA STURMER
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>1) We agree in principle with the need for expansion, but fear the uncertainty of the effect of Brexit, therefore <b>the lower figure for new houses seems a good starting point</b>, perhaps the local figure, but surely not the upper figure?</p> <p>5) <b>Even the lower figure would necessitate new a surgery, school and other amenities</b> which should be the obligation of the builder (the larger companies can afford this better if developing the whole site)?</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9352
<b>Full Name</b>	KENNETH NEWELL
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>Borough Issues</b></p> <p>For my objection to vastly increasing housing throughout the Borough, I can do no better than quote from an article from the Sunday Times on November 26th, 2017 written by the ex-BBC radio 4 Today show editor, Rod Liddle.</p> <p>He was reviewing the recent budget promise to build more than a million new homes and said "Yet no party thinks we should build fewer homes than Hammond has suggested. They'll tell you we should build many more. And the reason we're concreting over some of England's most placid and peaceful scenery is never stated. It is almost entirely the result of our uncontrolled and utterly unsustainable immigration, which the government vowed to sort out but has been useless in so doing. Our birth</p>

	<p>rate is in decline – 1.79 children born per woman last year in the UK – so that’s not fuelling the demand. The reason we are bullied into building more houses is that, catastrophically, we let into our country a net 250,000 people a year. That’s a city the size of Newcastle every year.</p> <p>Earlier this year, the communities minister Sajid Javid said immigration was responsible for only a third of the need for new homes, his nose growing with every word uttered. This rubbish was exposed recently when it was revealed that eight out of ten of the new households formed over the past 15 years was headed by a migrant. With fewer migrants, we’d have no housing crisis. We wouldn’t need to pave over the entirety of southern England.”</p> <p>I do not wish this beautiful area, which has been my home for nearly 40 years, to be sacrificed to bail out the ineptitude of governments of all persuasions. As a general principle, I have no objection to limited immigration since I believe it is healthy for the country, but not on the scale we have experienced this century.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9360
<b>Full Name</b>	Mrs Susan Newell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>My objections are in two parts. Firstly, I object to the general principle of vastly increasing housing throughout the Borough, and secondly, I object specifically to the proposals relating to Tring where I live.</p> <p><b>Borough Issues</b></p> <p>For my objection to vastly increasing housing throughout the Borough, I can do no better than quote from an article from the Sunday Times on November 26th, 2017 written by the ex-BBC radio 4 Today show editor, Rod Liddle.</p> <p>He was reviewing the recent budget promise to build more than a million new homes and said “Yet no party thinks we should build fewer homes than Hammond has suggested. They’ll tell you we should build many more. And the reason we’re concreting over some of England’s most placid and peaceful scenery is never stated. It is almost entirely the result of our uncontrolled and utterly unsustainable immigration, which the government vowed to sort out but has been useless in so doing. Our birth rate is in decline – 1.79 children born per woman last year in the UK – so that’s not fuelling the demand. The reason we are bullied into building more houses is that,</p>

	<p>catastrophically, we let into our country a net 250,000 people a year. That's a city the size of Newcastle every year.</p> <p>Earlier this year, the communities minister Sajid Javid said immigration was responsible for only a third of the need for new homes, his nose growing with every word uttered. This rubbish was exposed recently when it was revealed that eight out of ten of the new households formed over the past 15 years was headed by a migrant. With fewer migrants, we'd have no housing crisis. We wouldn't need to pave over the entirety of southern England."</p> <p>I do not wish this beautiful area, which has been my home for nearly 40 years, to be sacrificed to bail out the ineptitude of governments of all persuasions. As a general principle, I have no objection to limited immigration since I believe it is healthy for the country, but not on the scale we have experienced this century.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9538
<b>Full Name</b>	Adrian miller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I hope you will take on board these comments and develop your plan with more thought to character and nature of towns and villages and of sustainable growth.</p> <p>I am not saying no to more development but do no more than build 300 new homes p.a. over the next 5 years that is approximately 1.7% p.a. almost twice the population growth rate. The capital receipts you receive through additional housing new homes bonus and s106 payments should go toward schools, medical social infrastructure in Berkhamsted so that all can benefit.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9586
<b>Full Name</b>	Mark Somervail
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

Your response - Please add your response here	<p><b>1 Housing</b></p> <p>I wholly agree with the need for new housing and the scale of the proposal seems reasonable.</p> <p>It just needs to be implemented properly.</p>
Include files	
Number	Question 16
ID	LP109761
Full Name	Aly MacLean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be</p>

recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green belt.

	<ul style="list-style-type: none"> <li>• One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</li> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9809
<b>Full Name</b>	Mr Paul Wardle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

Your response - Please add your response here

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However, we would like to take this opportunity emphasize just a few of the most important points within that response.

...

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

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- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG

has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO9892
<b>Full Name</b>	Miss Jane McCLELLAND
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	



Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	In response to question 16: I believe that Option 1 is the preferred
Include files	
Number	Question 16
ID	LPIO9984
Full Name	mr Kevin Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10032
<b>Full Name</b>	Jill Mewha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<p><b>Housing numbers - Please provide your chosen option</b></p>	<p>d) Another figure (please specify).</p>
<p><b>Your response - Please add your response here</b></p>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller</li> </ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10101
<b>Full Name</b>	Melanie Frankel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10149
<b>Full Name</b>	Natalie Crane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10206
<b>Full Name</b>	Mr Tim Beeby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

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evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes)

	would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10253
<b>Full Name</b>	John and Jane Beeley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or</i></p>

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**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10303
<b>Full Name</b>	Kathleen Lally



<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I am writing in response to the latest plan for housing development in Berkhamsted, most of which suggests an excessive and impractical number of new houses. I have read your Local Plan 2017 and I have read the reply of Berkhamsted Residents' Action Group (BRAG) and agree that <u>Option 1B is the only option acceptable</u>.</p> <p>I agree entirely with the BRAG response to your plan.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific</i> </li></ul>

*Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green

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**Include files**

**Number**

Question 16

<b>ID</b>	LPIO10351
<b>Full Name</b>	J&P Savage
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Secondly, the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p>

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10395
<b>Full Name</b>	Mrs J Henry
<b>Company / Organisation</b>	C/O Phillips Planning Services Ltd
<b>Position</b>	Mr John CE Phillips
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p>Irrespective of the outcome of the Governments' consultation on the 'Right homes in the right places'</p> <p>this projection of housing requirements best meets the core objectives of Government and local</p> <p>policy because it takes into account market conditions and price differentials. The higher total</p>

	projected is also most likely to provide the sco~ to deliver affordable housing and meet housing needs.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10417
<b>Full Name</b>	Mr Daniel Parry
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10466
<b>Full Name</b>	David Burbidge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.



To avoid full repetition of the extensive points made in the BRAG response, **I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name**

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10516
<b>Full Name</b>	Mr Stephen Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>I would however like to make a few specific comments.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the</li> </ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10564
<b>Full Name</b>	Mr Roger Petts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>...</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also</li> </ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10611
<b>Full Name</b>	Simon Chilton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10661
<b>Full Name</b>	Sally and David Williams
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Please register as support for BRAG's submission.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding</i> </li></ul>

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**Include files**

<b>Number</b>	Question 16
<b>ID</b>	LPIO10709
<b>Full Name</b>	Mrs Jenny Jenkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10754
<b>Full Name</b>	Taylor Wimpy Strategic Land
<b>Company / Organisation</b>	Taylor Wimpy Strategic Land
<b>Position</b>	C/O Pegasus Group
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p><b>Option A</b> (602 dwellings per annum) is not considered a reasonable option and should be discounted. This figure is based upon a 40% cap on the adopted Core Strategy requirement. However, by the time the Local Plan will have progressed to Examination, the Core Strategy will be over five years old and under the proposed standardised methodology, the capped 40% increase should no longer be applicable. As such, option A is irrelevant for the continuing preparation of the Local Plan.</p> <p><b>Option B</b> (756 dwellings per annum) is based upon a Strategic Housing Market Assessment that seeks to identify the Council's objectively assessed housing need. This approach to plan preparation is expected to be 'overtaken by events'; the proposed submission Local Plan is due for publication in Spring 2018, around the time the proposed standardised methodology is due to take effect. Furthermore the Government intends that one of the 'tests of soundness' for Local Plans will soon include adherence to the standardised housing methodology. In this case, a Local Plan based upon the SHMA figure could be rendered out-of-date very quickly resulting in wasted time and effort, and the need to revisit the Plan and identify additional sites. The Council should therefore anticipate this eventuality and plan positively to meet the requirements of the emerging standardised need calculation.</p> <p>In any event, it should be noted that the OAN figure of 756 dwellings per annum has not been tested and is subject to change as household projections are updated. For example, the SHMA is derived from the 2012-based household projections which have since been superseded by 2014-based projections. These 2014-based projections point towards a demographic-led baseline increase of 743 dwellings per annum before any other adjustments such as conversion of households</p>

to dwellings, or the application of any market signals uplift (currently expressed in the SHMA as a 3% uplift, meaning Dacorum's need would increase to 765 dwellings per annum) which may in turn be critiqued through the examination of the Plan. With these issues in mind, it is probable that any future updates to a SHMA-based requirement will point towards a significant increase in housing need in Dacorum.

**Option C** (1,000-1,100 dwellings per annum) reflects the emerging standardised housing need methodology which is due to take effect in Spring 2018. We understand this is based upon a demographic baseline need of 750 dwellings per annum 2016-2026, plus an uplift of around one third for housing affordability in Dacorum. The standardised methodology clearly seeks to address the problems which arise from poor housing affordability and the significant uplift required in Dacorum is a direct function of the particularly poor housing affordability observed in the Borough. If the Council plans to meet this target, it will be making an important step towards reversing a trend of expensive housing which affects the lives of residents of Dacorum. It will also be well placed to progress the Local Plan without delay once the standardised methodology is formally brought into effect in Spring 2018.

The Issues and Options paper notes that this will require the Council to allocate a significantly higher number of development sites than the other options. Although this target will be a challenge to meet, it appears that there is capacity to do this within the boundaries of Dacorum Borough. As discussed elsewhere within these representations, there is also limited opportunity to redistribute growth to other neighbouring authorities who are facing their own challenging targets and are subject to significant constraints.

Drawing the above together, we consider that:

- options A and B should be discounted as they will be rendered out-of-date well before the Local Plan will be adopted;
- Option C is based on an emerging methodology which remains subject to change but which indicates a 'direction of travel' for future plan making and embeds a significant uplift to address the affordability issues in Dacorum

As such, at this stage, the Council should plan to meet its housing target in line with the emerging standardised methodology set out in **option C**.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10776
<b>Full Name</b>	Mrs J Marshall
<b>Company / Organisation</b>	
<b>Position</b>	



<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP1010802
<b>Full Name</b>	Grant Imlah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Moreover i am aware that The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the</p>

suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the

	<p>Governments recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> <li>• One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</li> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10854
<b>Full Name</b>	Sheila Dawkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

**Your response - Please add your response here**

I have studied the above plan, accessed the BRAG website, and attended the Berkhamsted Citizens Association Visioning Evening on 15 November and the Berkhamsted Town Council presentation on 22 November.

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

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**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC

urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10903
<b>Full Name</b>	Jean Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>1 D) 476 Urban Capacity</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need."</p>

	<p>DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO10952
<b>Full Name</b>	Christopher Stafford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green</i></p>

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neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green

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	of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11003
<b>Full Name</b>	Mrs Patti Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11049
<b>Full Name</b>	J M Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	D)Urban Capacity

	<p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</p> <p>DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11097
<b>Full Name</b>	Denis Maclure
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>D)Urban capacity</p> <p>This target is a full 11% higher than the 430 in the current Plan, and even that figure called for Green Belt release. But 476 is possible within the framework of ‘urban capacity’. Also, DBC is not exploiting the freedoms it has</p>

	to start with a figure for housing need, then revise it downwards for reasons of Green Belt, AONB, SSI etc. Even the Inspector was repeatedly stressing that the need figure does not dictate the housing target figure. DBC's mechanistic approach here is causing unnecessary harm, doing both itself and its citizens down. If it really wants to be inflexible, it should instead make sure east Hemel is included in DBC targets despite resistance from St Alban's.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11130
<b>Full Name</b>	Cally Emmas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> <li>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need.</i>"</li> </ul>

*These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11177
<b>Full Name</b>	Mr Neil Aitchison
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Without a proper capacity study the acceptance of numbers is not sustainable. DBC should resist any numerical target. The options given do not seem to reflect what would be the right solutions on a proper planned expansion of planned areas.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11224
<b>Full Name</b>	Jon Rollit
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding</p>



Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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*planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green

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	BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11274
<b>Full Name</b>	Kate Locke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>In addition I would reiterate the extensive points made in the BRAG response to the 'Issues &amp; Options' consultation. I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. The Berkhamsted Residents Action Group (BRAG) has responded in full.</p> <p>In addition, I like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various</p>

assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in

	<p>previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11362
<b>Full Name</b>	Ms Lorraine Gilmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	BRAG has responded in full to the 'Issues & Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you

accept this email as confirmation that I wish Dacorum Borough Council (DBC) to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasise some of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states *"Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need."* DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476

new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green
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	<p>within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11411
<b>Full Name</b>	Conian
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new</p>



dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

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set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green

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	prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11450
<b>Full Name</b>	Mr & Mrs J Neale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The household growth projections for 2016-36, outside of London, are North of England 11.1%, Midlands 15.7%, East 20.6%, South East 20.0%, West 17.2%</p> <p>There is clear disparity across England. Dacorum's projection is 23.4%.</p> <p>(<a href="https://www.gov.uk/government/uploads/attachment_data/file/554838/2016-07-12-household-projections">https://www.gov.uk/government/uploads/attachment_data/file/554838/2016-07-12-household-projections</a> Published 12 July 2016)</p> <p>Given the Government's emphasis on the Midlands Engine and the Northern Powerhouse, the lowest possible figure for Dacorum should be chosen on the basis that the Government's policies to attract jobs, people and housing demand away from London and the Home Counties will be successful.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11474
<b>Full Name</b>	Mrs Jenny Summerfield
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	***** Preferably my answer is NO NEW HOUSES
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11481

Full Name	Mr Alan Ledger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	The lowest growth target should be used in view of the constraints here at Berkhamsted referred to elsewhere in this response and the amount of development that has already occurred or is in the pipeline.
Include files	
Number	Question 16
ID	LPIO11521
Full Name	Ms Eliza Hermann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	Given there is no single agreed method for calculating Objectively Assessed Housing Need (OAN), and given there is as yet no outcome from the government following its "Right Homes Right Places" consultation, I believe <b>the most logical starting point</b> is the approved 2006-2031 Core Strategy figure of 430 homes per year. That figure includes the recent removal of 82.2 hectares of Green Belt (via the six Local Allocations) which is a large amount of Green Belt land that will now be built on and lost as green space forever. Any figure above 430 homes per year must be limited to what is achievable from optimising "urban capacity" i.e. through brownfield redevelopment and regeneration. I understand that Dacorum has calculated this figure as 476 homes per year, and therefore <b>476 homes per year is the most reasonable target figure</b> . Beyond this, the emphasis must be on explicit recognition of the constraints on meeting housing need resulting from the need to protect the Chilterns Area of Outstanding Natural Beauty and the Green Belt.
Include files	
Number	Question 16
ID	LPIO11600
Full Name	Janet and James Honour
Company / Organisation	
Position	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints</li> </ul>

of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of

	<p>capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11647
<b>Full Name</b>	john and barbara neale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The household growth projections for 2016-36, outside of London, are North of England 11.1%, Midlands 15.7%, East 20.6%, South East 20.0%, West 17.2%</p> <p>There is clear disparity across England. Dacorum's projection is 23.4%.</p> <p>(<a href="https://www.gov.uk/government/uploads/attachment_data/file/556146/2016-07-12-household-projections-12-july-2016.pdf">https://www.gov.uk/government/uploads/attachment_data/file/556146/2016-07-12-household-projections-12-july-2016.pdf</a>) Published 12 July 2016)</p> <p>Given the Government's emphasis on the Midlands Engine and the Northern Powerhouse, the lowest possible figure for Dacorum should be chosen on the basis that the Government's policies to attract jobs, people and housing demand away from London and the Home Counties will be successful.</p>

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11716
<b>Full Name</b>	kevin minier
<b>Company / Organisation</b>	Dacorum Patients Group
<b>Position</b>	chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>1 Housing – the Local Plan must ensure that our housing provision meets the needs of all our residents and encourages people from all walks of life to live in Dacorum – we need a 24/7 workforce. Housing solutions must be affordable with the Local Plan supporting the infirm, the unemployed, homeless, manual workers as well as professionals.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11755
<b>Full Name</b>	Edmund Hobley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy</p>



constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**Brag Response to question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local*

*planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity,

	BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11807
<b>Full Name</b>	John Thomson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Option (a) is the most reasonable. It is what the Government requires of Dacorum. The Chancellor in the recent Budget stated a target of 300K dwellings by the mid 20's (38% increase on the 217K built last year). <u>Dacorum needs to tackle and budget for much more brownfield and "windfall" sites.</u> It is also essential that the "east HH" site within St Albans but abutting Hemel Hempstead be "allocated" to Dacorum, thereby reducing the delivery target from elsewhere within Dacorum.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11837
<b>Full Name</b>	peter faulkner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	Your consultation includes 3 levels of housing. The Government Requirement is 602 houses per year. In the absence of necessity to exceed 602 that is the level you should adopt.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11860
<b>Full Name</b>	Councillor Alan Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>'a' is the option that most closely abides by Government policy hierarchy on housing levels and preventing the development of the Green Belt, as required by the NPPF.</p> <p>The other options are not necessary, as they are not required by the Government; flawed, as per the earlier comment made under question 3 about trying to rely on the Strategic Housing Market Assessment on its own; and would needlessly increase the pressure on the Green Belt.</p> <p>By complaining about having the housing requirement reduced, the Council clearly shows that the Government is not forcing it to allow the higher amounts of development, and that it is trying to allow development which is unnecessary and more damaging to the Green Belt.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11905
<b>Full Name</b>	Janet Mason
<b>Company / Organisation</b>	Berkhamsted Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints, particularly infrastructure, as should the allocation of development. It should be recognised that</p> <p>predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <p>The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. Berkhamsted is already near its estimated infrastructure capacity. Such disparities within Dacorum must be taken into account when assessing development numbers and site options going forward. DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be</p>

	<p>incorporated which should amount to a minimum of three years housing supply.</p> <p>Para 6.1.14 is a misleading paragraph which appears to be designed to justify a high housing target. The Government consultation does not indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to disadvantage authorities working on updating their plans, indeed the consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</p> <p>An Inspector may conclude that a local plan does not need to provide for its objectively assessed housing need if there are significant constraints. In a report dated 29 September 2017, in respect of the Adur Local Plan, the Inspector agreed that Adur District Council could not satisfactorily deliver its OAN for housing sustainably because of "the significant constraints that exist" and concluded that the Council's approach to housing was justified (PINS/Y3805/429/6 refers).</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11952
<b>Full Name</b>	Dee Sells
<b>Company / Organisation</b>	Markyate Parish Council
<b>Position</b>	Parish Clerk/ RFO
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<p><i>None. We accept that the Borough Council has to have a target, and would support the reasoned figure of 756 (b) but like DBC, Markyate Parish Council has responded to the Government published a consultation document, 'Planning for the right homes in the right places', which suggests a new standard approach to calculating housing. We believe that their calculation is flawed because it does not take into account that many South West Herts residents are commuters into London.</i></p> <p><i>However the Government alone can take action to find a way of providing more drinking water. The area is already short of water, and just this week the water authorities have written with a current impending drought warning. Water that does fall as rain needs storing for future use, or ways of importing or de-salinating sea water need to be put in hand before any more homes</i></p>

	<i>are built in the South East. If this is not done the Government needs to plan to relocate jobs away from he South East not build more homes here.</i>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO11986
<b>Full Name</b>	Mark Behrendt
<b>Company / Organisation</b>	Home Builders Federation
<b>Position</b>	Planning Manager – Local Plans
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Housing needs</p> <p>We note that you raise the issue of the Government's consultation on the standard methodology for assessing housing needs. As we have mentioned to other LPAs, whilst we agree that the standard methodology has limited weight it does give a better understanding as to the Government's direction of travel with regard to both the robustness of the ONS projections and the degree of uplift required to respond to market signals. Other than these considerations, which relate to existing provisions in Planning Practice Guidance, we do not consider it appropriate to plan on the basis of the standard methodology.</p> <p>In particular, we do not consider it to be appropriate for the Council to plan on the basis of a capped uplift to the current housing requirement in the Core Strategy. Whilst the cap applies to all areas with an adopted plan that is less than 5 years old the requirement in the Dacorum Core Strategy was based on the capacity constrained RSS target. This cannot be considered an appropriate starting point. Given the Core Strategy will be five years old in September 2018 we would strongly suggest that the Council looks to plan for a higher level of housing need either or the standard methodology or the SHMA</p> <p>We consider the SHMA to underestimate the level of housing need within the Borough. Firstly, the assessment does not use the most recent data on household projections available. Last year the Government published the 2014 based household projections, these show an increase of around 1,000 new households for Dacorum. PPG suggests that where there is a meaningful change in the projections LPAs should consider updating their OAN. We would consider this to be a meaningful change and that the SHMA should be updated to take account of the most up to date household projections.</p> <p>Secondly, we do not consider the SHMA to have taken sufficient account of market signals, particularly in relation to affordability. The most recent lower quartile</p>

	<p>affordability ratios</p> <p>1 for Dacorum show a significant decline in affordability since 2013. In 2013 the lower quartile work place based affordability ratio was 9.63. However, by 2016 this had risen to 12.38. This is a significant increase and much greater than outlined in the SHMA. This picture is replicated across the HMA with affordability getting significantly worse. So, whilst the period following the recession showed a relatively stable position it would appear that this situation has changed as demand grows and the supply of land to support further housing development has not followed suit. We would suggest that a more considerable uplift is applied to the 2014 household projections and that the proposed uplift of just 4% is insufficient.</p> <p>In summary we consider that the Council should not look to plan for the level of need set out in the most recent Government consultation. This does not represent housing needs as it is based on a housing target that was constrained by RSS. The Council should look to plan for an OAN based on the most recent household projections plus a more substantial uplift than has currently been applied if it is to provide the necessary boost to housing supply required by NPPF. It would also ensure that the Council prepares a plan that delivers the increase in housing supply required for the area.</p> <p>1.  <a href="https://www.dacorum.gov.uk/council-and-community/your-voice/your-voice-2016-17">https://www.dacorum.gov.uk/council-and-community/your-voice/your-voice-2016-17</a></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12052
<b>Full Name</b>	David Wilyman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

Standard BRAG response to Question 16. Please note full document is attached to Question 46

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

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- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the



housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT

	<p>indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12103
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>The Chiltern Society has long campaigned for the protection of the Green Belt and the Chilterns AONB. The protection of these areas is essential to maintain the character and appearance of the area and retain it as a 'green lung' around the City of London.</p> <p>We have sought to oppose many developments in the Green Belt and will continue to do so where we consider the impact would be unacceptable in relation to its openness and permanence.</p> <p>It is clear from the Local Plan that the Council has identified a high housing target through a Strategic Housing Market Assessment (SHMA). However, the recently published DCLG methodology identifies a lower figure for Dacorum. Given that the Green Belt and AONB cover much of the area, it is essential that any encroachment into these areas is reduced to an absolute minimum.</p>

To minimise impacts on the Green Belt, we consider that the overall number must be kept as low as possible in the hope that much of this could be met on brownfield land or land within the urban areas. We would be happier, therefore, if the Council were to adopt the lower figure of 602 per year suggested in the recent Government consultation. One reservation we have with this is that the number was based on a percentage increase in the hope that this would increase supply and reduce house prices. In an expensive area such as the Chilterns we do not consider that increasing supply would make much difference to price.

Also, for each site proposed, the Council would need to demonstrate why very special circumstances exist for allowing housing development. The benefits must clearly outweigh harm to the Green Belt and the need for more housing does not automatically create a very special circumstance.

There is some scope within the area to provide more affordable homes in appropriate locations for young people who wish to stay in the area. Provision such houses must be in areas where sustainable transport can be provided.

Using the SHMA figure of 756 per year would create greater pressure on the Green Belt and therefore more sensitive areas would be likely to be allocated.

The top figure of 1000 to 1100 would be totally unacceptable and create a major threat to the openness and permanence of the Green Belt. The Council would struggle to meet the 5 purposes of the Green Belt set out in paragraph 80 of the NPPF. Our understanding from the exhibition events was that if the Council does not have a Local Plan in place by September 2018 (when the existing Plan is 5 years old) then the Government will impose these figures on the Council. The timetable for the new Local Plan is for adoption in 2019 so that deadline is likely to be missed. We believe development on this scale would be a disaster for Dacorum, requiring large areas to be taken out of the Green Belt for development and extensive new infrastructure built to serve the new developments.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12144
<b>Full Name</b>	Ray Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<p><b>Housing numbers - Please provide your chosen option</b></p>	<p>d) Another figure (please specify).</p>
<p><b>Your response - Please add your response here</b></p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly. Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>Standard BRAG response to Question 16. Please note full document is attached to Q46.</p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC</li> </ul>

urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are

	<ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12175
<b>Full Name</b>	Ms Julie Hollway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>4. I would however also recommend reviewing the figures quoted in the document regarding the number of homes actually needed in the area.</p> <p>5. Please also assess what should be considered in the Dacorum plan vs plans for adjacent areas, eg the site east of Hemel alongside M1 and currently considered to be St Albans should be considered as delivering homes under the Dacorum local plan as all the infrastructure for these proposed homes will be provided by Hemel.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12208
<b>Full Name</b>	Douglas & Christina Billington
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban</li> </ul>

boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised



	<p>that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12287
<b>Full Name</b>	Richard Frankel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy</p>

states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

Standard BRAG response to Question 16. Please note full document is attached to Question 46.

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation

proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the

	last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12348
<b>Full Name</b>	Mr Brian Kazer
<b>Company / Organisation</b>	Tring in Transition
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<p>We support 756 homes per year in Dacorum. This is the figure from objective evidence (present population, projected population growth of 22.9%, 2.4 people per household).</p> <p><b><i>The formula for number of houses proposed at para 20 in the Govt consultation document “Right Homes Right Places” is fundamentally flawed.</i></b></p> <p>It is fundamentally flawed regarding planning authorities whose residents commute into London, such as Dacorum.</p> <p>That is because the proposed approach is based on median house prices where people work, ie for the large percentage of Dacorum commuters this means London where house prices are far higher than in Dacorum. The proposed formula would inflate house building requirements substantially above the level justified by evidence/projected population growth. The formula should instead be based on the median house price in the area where people live.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12355
<b>Full Name</b>	ms rona morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I do not believe that it is acceptable for my councillors to set a number above that which is sensibly achievable

	<p>given the constraints in the area. DBC have calculated this number as 476 new dwelling a year. If Green Belt release was excluded this number may be even lower. I believe that it is possible for councils to set a figure lower than the local housing need in certain circumstances. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." I remain to be persuaded that DBC has done enough to challenge the numbers and gain credit for the St Albans banked East Hemel extension. The local housing need is only part of the evidence not necessarily the answer.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP1012431
<b>Full Name</b>	Judy Halden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special</p>

Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

Standard BRAG response to Question 16. Please note full document is attached to Question 46.

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- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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*These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12479
<b>Full Name</b>	Meenakshi Jefferys
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p>



**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household

	<p>numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12526
<b>Full Name</b>	Mrs Jane Barrett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as

confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

Standard BRAG response for Question 16. Please note full document is attached to Question 46.

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12575
<b>Full Name</b>	mr paul healy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12625
<b>Full Name</b>	Merrick Marshall

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasise just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints</li> </ul>



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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12674
<b>Full Name</b>	Monika & Casper Gibilaro
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under our name</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities</i></p>

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	plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12722
<b>Full Name</b>	Lorna Ginn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It</p>

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- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green

	<ul style="list-style-type: none"> <li>• One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</li> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12771
<b>Full Name</b>	Mr Raymond Phipps
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

Your response - Please add your response here

I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.

...

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12818
<b>Full Name</b>	Ingrid Carola McKenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	

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In addition, I draw attention to some of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12866
<b>Full Name</b>	Mr Stephen Lally
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</b></p> <p>...</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> </ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12920
<b>Full Name</b>	Jon Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO12969



<b>Full Name</b>	Edward Keane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13018
<b>Full Name</b>	Bettina Deuse
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have</p>

calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to question 16 below (full BRAG response see question 46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector

suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper

	<p>clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
<b>Include files</b>	

Number	Question 16
ID	LPIO13071
Full Name	Mr Paul Tinworth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p><b>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</b></p> <p>...</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding</i> </li></ul>

*Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
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**Include files**

**Number**

Question 16



<b>ID</b>	LPIO13119
<b>Full Name</b>	Hilary Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly. Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p>

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household

	<p>numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13185
<b>Full Name</b>	Mr J G Botha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Green Belt and rural areas should be saved. The fact that Brown field sites are becoming short supply in the area should not mean Green Belt is then by default built on. If there is not the space for the developments then they should not occur.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13216
<b>Full Name</b>	Mrs Suzanne Gray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>(D)?</p> <p>You will have to see how many building workers there are to build the houses, in particular if because of Brexit many in the building trade go back to Eastern Europe. Also how expensive the houses are, how the economy in the country is, whether people choose to live in this area.</p> <p>Tring will not be a small market town if 3,000 more homes are built by 2036. It will be more suburbia. Tring station car park will have to be enlarged and toilets built.</p> <p>Although you have put 40% affordable houses, generally that becomes a much smaller proportion once the houses are built. All the areas in Tring have 40% affordable houses and the same proportion of green space?</p> <p>I do think all areas should have a mix of houses and that some areas in Tring are not really suitable at present the proposed development on the North side of the Icknield Way (TR-H6) as at present the canal and feeder to the canal are the boundary for development. I can see that if the proposed development (TR-H6) takes place Little Tring could soon join up with Tring.</p> <p>The proposed development on Station Road/Cow Lane (TR-H4) is very near the cross roads which is already quite dangerous as you cannot see clearly traffic from the station direction as you come down Cow Lane.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13260
<b>Full Name</b>	D. Phillips
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I fully concur with the comments attached from BRAG.

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local authorities have to calculate housing need but then Government policy states 'Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. This include, but are not limited to, ancient woodland, the green belt, areas of outstanding natural beauty and sites of special scientific interest. They also need to engage with other authorities - through the duty to co-operate - to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need'. DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependant on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller

buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans.

	<p>Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> <li>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13378
<b>Full Name</b>	Mrs Christine Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13379
<b>Full Name</b>	Mr Alan Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16

<b>ID</b>	LPIO13453
<b>Full Name</b>	Mrs Catherine Imber
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year.</p> <p>Figures from a development to East Hemel that is proposed by St Albans should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints</li> </ul>



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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13501
<b>Full Name</b>	Deborah Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft</p>

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**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13556
<b>Full Name</b>	Mr Alan O'Neill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<p><b>Housing numbers - Please provide your chosen option</b></p>	<p>d) Another figure (please specify).</p>
<p><b>Your response - Please add your response here</b></p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation.</p> <p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to</i> </li> </ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13609
<b>Full Name</b>	Sue O'Neill

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation.</p> <p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine</i> </li></ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13671
<b>Full Name</b>	Tim Uden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various</p>

assumptions on which they are calculated. DBC have not considered the rejected options properly.

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**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13736
<b>Full Name</b>	Edward Hatley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as

confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year.

However the figure of 476 underestimates the amount that can be achieved within urban boundaries. It is accepted that Local Authorities have to calculate housing need.

They must however note that Government policy states *"Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need."*

DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated. In so doing should the amount should equate to a minimum of three years housing supply. This, coupled with increased density numbers in appropriate areas, would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on:

A realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints

A realistic assessment of the allocation of development.

The recognition that predictions of need are subject to quite large margins of error because of the various assumptions on which they are calculated.

I do not believe that DBC have considered the rejected options properly.

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**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13786
<b>Full Name</b>	Mr Roger Didham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas</i></p>

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- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.



<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13841
<b>Full Name</b>	Alex Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly. Q17. Developers must be forced to provide the number of</p>

affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in

	<p>previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13947
<b>Full Name</b>	Mrs Emma Fallon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I do not object to Dacorum addressing the need for additional housing in the area or indeed of the careful or well thought out planning for new housing in the area

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13973
<b>Full Name</b>	Lady Valerie Corbett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	The government requirement of Option 1 seems the least-worst solution
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO13988
<b>Full Name</b>	Mrs Niki Pinchin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Basing your planning targets on unknown quantities and guesstimates is both naive and potentially devastating to this borough.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14011
<b>Full Name</b>	Danny Jennings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<b>I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum's Local Plan.</b> ...

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
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- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household

	<p>numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14060
<b>Full Name</b>	Mr John Goffey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<b>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response</b>

**to the DBC *Issues and Options* document. We would, in addition, like to add the following points concerning Question 33 of the above document.**

...

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14108
<b>Full Name</b>	Sue Elleray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).



Your response - Please add your response here

**The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.**

Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

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**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

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buildings in appropriate areas would release more capacity.

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14159
<b>Full Name</b>	Mr Richard White
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</b></p> <p>...</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> </ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14301
<b>Full Name</b>	Ms Vicky Tattle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities –through the duty to co-operate –to determine</p>

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**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14358
<b>Full Name</b>	Mr Humphreys
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Less than 602. How many on housing list ? are they local residents ?
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14389
<b>Full Name</b>	Ray Tattle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities –through the duty to co-operate – to determine how any need that</p>



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**Include files**

<b>Number</b>	Question 16
<b>ID</b>	LPIO14437
<b>Full Name</b>	Giselle Okin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need.</i> </li></ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14486
<b>Full Name</b>	Mr David Griffin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</i></p> <p><i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i></p> <p><i>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</i></p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14668
<b>Full Name</b>	Ann Bunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I question the projections of population growth that supports this development do not reflect the local population growth.
<b>Include files</b>	
<b>Number</b>	Question 16

<b>ID</b>	LPIO14682
<b>Full Name</b>	Ann Bunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	check on population growth to our area
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14699
<b>Full Name</b>	Edith Howell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14701
<b>Full Name</b>	Mr Howell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14705
<b>Full Name</b>	mr ron perkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	



Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<b>430 per year</b>
Include files	
Number	Question 16
ID	LPIO14712
Full Name	Mrs Jean Perkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<b>430 houses</b>
Include files	
Number	Question 16
ID	LPIO14763
Full Name	Ms Paula Farnham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues &amp; Options' consultation. I could make similar comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>However, I would like to take this opportunity to emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14807
<b>Full Name</b>	Steve Baker
<b>Company / Organisation</b>	CPRE - The Hertfordshire Society
<b>Position</b>	Planning Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Whilst the outcome of the consultation on the right approach to calculating housing need is pending, it is not possible to support or reject any one housing target. However, the new methodology will still only be the starting point in deciding on a housing target, as the latter has to take into account constraints such as those set out in the NPPF, and can be lower than the housing need calculation, which itself will be based on projections that by definition do not take planning policy into account.</p> <p>In setting a housing target, the Council must analyse the components of housing need to identify the numbers of those households whose need for a home in the Borough is acute or intense enough to justify removal of land from the Green Belt to house them, i.e. represents exceptional circumstances.</p> <p>Dacorum should not be considering accommodating housing need for London, which should be considered first on brownfield land in London. Housing need for Dacorum should be met within the towns and villages with Green Belt around them, in Dacorum on other brownfield land, or to areas beyond the Green Belt.</p> <p>Whatever figures is used as a starting point, it is most important that all the constraints on providing for housing need are properly assessed, including safeguarding the Green Belt as the primary consideration. Only development, which is justified by exceptional circumstances, should be provided for in the Local Plan through the removal of land from the Green Belt.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14834
<b>Full Name</b>	Bev Mckenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<p><b>Housing numbers - Please provide your chosen option</b></p>	<p>d) Another figure (please specify).</p>
<p><b>Your response - Please add your response here</b></p>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p><b>In addition, I draw attention to some of the most important points within that response</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p>

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an

	<p>example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14881
<b>Full Name</b>	Mr Michael Curry
<b>Company / Organisation</b>	Tring Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The locally assessed housing need figure (756) fails to take into account the constrained nature of land availability in Dacorum because of Green Belt and A.O.N.B.</p> <p>A figure should be derived that reflects the ability of the Borough to deliver the housing growth and the necessary</p>

	<p>infrastructure (“organic growth”). Whilst respecting the Government’s policy to provide a major boost to the housing market, a blanket imposition of a target without consideration of local circumstances is irresponsible.</p> <p>As an example of the alternative basis suggested, the following calculation is based upon the assumption that the maximum number of houses that each group in the settlement hierarchy can take sustainably is the minimum figure quoted in option 1:</p> <ul style="list-style-type: none"> <li>• 1,750 Hemel Hempstead Option 1A</li> <li>• 1,200 Berkhamsted &amp; Tring Option 1A</li> <li>• 850 Bovington, Kings Langley &amp; Markyate Option 1C</li> <li>• 3,800 Total or 640 dwellings pa.</li> </ul> <p>The assumption is probably weakest in relation to Hemel Hempstead, which probably have a greater capacity to absorb housing. Taking the 2,980 figure quoted in option 1b the total contribution increases to 5,030 or 694 dwellings per annum.</p> <p>Closer engagement with local communities at the beginning of the planning process would enable a realistic assessment of the potential contribution each settlement can make.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14937
<b>Full Name</b>	Malcolm and Jill Allen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are</i></p>



not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which*

*prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO14986
<b>Full Name</b>	Mr Clive Freestone
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various</p>

assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in

	<p>previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15036
<b>Full Name</b>	Mr & Mrs D A Simmons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.

We request you accept this summary as confirmation that we wish DBC to duplicate BRAG's responses under our names.

We would like to take this opportunity to emphasize a few of the most important points within that response, ***in particular our response to Q25.***

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
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	<p>would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> <li>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15079
<b>Full Name</b>	Tom Simmons
<b>Company / Organisation</b>	St William Homes LLP
<b>Position</b>	Development Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<p>St William consider that DBC should set a housing target that seeks to meet their full locally assessed need as identified by the South West Hertfordshire Strategic Housing Market Assessment ('SHMA'). As such, the figure of 756 homes per annum is an appropriate starting point (question 16).</p> <p>DBC should also apply paragraph 47 of the National Planning Policy Framework (NPPF) which requires local authorities to identify and update, annually, five years' worth of housing against their housing requirements, with an additional 5% buffer to ensure choice and competition and a 20% buffer, where there has been record of persistent under delivery. Applying these buffers would increase the annual housing target based on locally assessed need to 907 homes.</p> <p>On 14 September 2017 the Government published for consultation proposals for a standardised calculation of objectively assessed housing need. Should the Government opt to implement this as part of the revised NPPF it is considered that the higher of this figure, or the locally assessed need figure, should take precedence in DBC.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15094



<b>Full Name</b>	Grand Union Investments
<b>Company / Organisation</b>	Grand Union Investments C/O Savills
<b>Position</b>	Associate Director
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>In finding the Core Strategy of 2013 sound on the basis of this being subject to an early review, the Inspector observed at paragraph 29 that the housing shortfall over the plan period is about 15% and, <i>'more importantly, there would be a general over-supply of housing in the short to medium term, especially over the next three years (as identified in the up-dated Trajectory)'</i>. In terms of the 'next three years', that updated trajectory anticipated the delivery of 535, 668 and 537 homes in the respective monitoring periods of 2013/14, 2014/15 and 2015/16. The Council's Annual Monitoring Report for 2015/16 (published January 2017) shows that actual completions have totalled 219, 379 and 659 homes in these same respective annual monitoring periods. This represents a shortfall of 483 homes or 28% against that which was anticipated at the time the Core Strategy was found sound on the basis of an early review of the Core Strategy being undertaken. The Council is therefore already considerably behind the level of completions that was anticipated by the Core Strategy, which even without this shortfall, was based upon an overall shortfall of 15% or 1,698 dwellings over the plan period. For this further reason, it is essential that the new Local Plan is put in place as soon as possible, and with sufficient growth proposed to address the overall shortfall which was not met by the Core Strategy and the further shortfall which has already occurred since the adoption of the Core Strategy.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15102
<b>Full Name</b>	Grand Union Investments
<b>Company / Organisation</b>	Grand Union Investments C/O Savills
<b>Position</b>	Associate Director
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<b>Issue 9 - What land is available for the new homes needed?</b>

	<ul style="list-style-type: none"> <li>Paragraph 6.2.5 of the consultation document is concerned with 'windfall' sites. The Council states in relation to windfall sites that '<i>Government rules prevent us from relying too heavily upon them as a source of supply</i>'. We wish to highlight that more precisely in terms of counting windfall towards five-year housing supply, the NPPF requires at paragraph 48 that local planning authorities must have '<i>compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply</i>'. The Council also remarks at paragraph 6.2.5 that for its new Local Plan it will check its windfall figure and consider whether it should make any assumption for larger windfall sites. In doing so, we remind the Council that it must have regard to the above mentioned requirement of the NPPF.</li> <li>In addition to the consideration of windfall supply, the Council also refers to work it has undertaken through its Strategic Housing Land Availability Assessment (SHLAA), housing vacancies and site specific work, such as its 'Two Waters masterplan' in arriving at a figure of land being available for the development of 10,940 homes over the plan period from existing and planned sources. However, the Council does not clearly present how many homes are anticipated for delivery through these respective sources of supply and justification for the assumptions that it has applied. It is important that the Council sets out this information as soon as possible in order that its assumptions about existing land supply can be clearly understood and properly evidence based.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15120
<b>Full Name</b>	Ena Hartland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	My opinion is that the most sensible option would be to accept the government's requirement, i.e. to plan to build the lowest number of houses which would satisfy the need.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15130
<b>Full Name</b>	Simon Foster Monique Bos
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	It is requested that the Council adopt the Government's draft figure of 602 homes per year. This reflects the constrained nature of the Borough, which is mostly covered by important designations, including the Green Belt, Rural Area (similar policy of restraint to the Green Belt) and Area of Outstanding Natural Beauty. To plan for a higher level of growth will inevitably result in new housing being built on sensitive land which is unacceptable in principle and would harm the character and appearance of the countryside.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15160
<b>Full Name</b>	Ms Tracy Puttock
<b>Company / Organisation</b>	Ashill Land Ltd
<b>Position</b>	Planning Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<p><i>Question 16 – Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</i></p> <p>We consider that the Council's emerging target should be informed by an up to date SHMA prepared in accordance with guidance set out within the NPPG. The South West Hertfordshire SHMA (2016) identifies a target for the Borough of 756 new homes per year [17,388 new homes over the Plan Period]), however given issues surrounding affordability (the affordability ratio for the Borough is over 13 compared to a national average of around 7 when based on CLG data), we consider that the addition of just an additional 28 new homes to reflect 'market signals' is not sufficient and that in reality housing need is higher than that set out in the SHMA.</p> <p>We consider that applying the Government's draft standard methodology for calculating housing need, at this stage, would be premature as this methodology is not scheduled to be finalised until 2018 and so is subject to change.</p> <p>Dacorum Borough Council, as set out within the NPPF, have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities such as new housing. The SHMA identifies an annual need for 3,151 new homes across</p>

	<p>the HMA, however it is not known what discussions (if any) have taken place between the authorities to discuss how this new housing will be delivered and whether Dacorum will need to accommodate unmet need from elsewhere, as is acknowledged within paragraph 6.1.17. It is appreciated that the Plan is still at the early stages of preparation and we expect that as the Plan is progressed, the implications of the duty to co-operate discussions will become clear and be reflected in the Council's proposed spatial strategy.</p> <p>In light of the above, we consider that the Council's housing target should be in excess of 756 homes set out within the SHMA. To understand what land is available for the new homes needed, the Council have undertaken an assessment of the capacity of all previously developed land in the Borough, which is assumed to include land at Button House (paragraphs 6.2.1 -.8). The Plan identifies that a total of 10,940 new homes can be delivered from such sites. This expected level of delivery is some way short of the SHMA derived need (of at least 17,388 new homes) meaning that some greenfield/open Green Belt land will inevitably need to be released, however this fact reiterates our view that to maximise housing delivering from brownfield sites all such sites capable of delivering 10+ homes should be allocated through the emerging Local Plan.</p> <p>A</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15177
<b>Full Name</b>	Bert Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p><b>Answer – a) 602 a year</b></p> <p>I have no confidence in the accuracy of any of the short term assessments and trying to project conditions that will be prevail in 20 years' time is in my view a complete waste of time and money. Small changes in the predictions over the multiple variables at play cause huge differences to the projections.</p> <p>To suggest that I am able to accurately quantify the reasonableness or otherwise of any of the "assessments" is an absurdly over-optimistic view of any individual's ability. I have suggested a relatively modest number to be adopted as the most reasonable because our Borough is already sufficiently developed. This number is higher than the current housing</p>

	target (430) and above the Urban Capacity figure (476). I am particularly concerned by the large-scale development options for Green Belt land in Tring. That is not to suggest that there will be opportunities for small-scale brownfield sites and local infilling for modest expansion but major housing and infrastructure development should be accomplished by major new town initiatives – including Hemel Hempstead.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15197
<b>Full Name</b>	Valerie Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p><b>Answer – a) 602 a year</b></p> <p>I have no confidence in the accuracy of any of the short term assessments and trying to project conditions that will be prevail in 20 years' time is in my view a complete waste of time and money. Small changes in the predictions over the multiple variables at play cause huge differences to the projections.</p> <p>To suggest that I am able to accurately quantify the reasonableness or otherwise of any of the “assessments” is an absurdly over-optimistic view of any individual's ability. I have suggested a relatively modest number to be adopted as the most reasonable because our Borough is already sufficiently developed. This number is higher than the current housing</p> <p>target (430) and above the Urban Capacity figure (476). I am particularly concerned by the large-scale development options for Green Belt land in Tring. That is not to suggest that there will be opportunities for small-scale brownfield sites and local infilling for modest expansion but major housing and infrastructure development should be accomplished by major new town initiatives – including Hemel Hempstead.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15219
<b>Full Name</b>	Sue Tiley
<b>Company / Organisation</b>	Welwyn Hatfield Borough Council
<b>Position</b>	Planning Policy and Implementation Manager
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The South West Herts Housing Market Area covers the whole local authority areas of Dacorum, Hertsmere, St Albans, Three Rivers and Watford. Nevertheless, there are strong housing market relationships between parts of the South West Herts Housing Market Area and Welwyn Hatfield and as a result, certain areas also fall within the defined Welwyn Hatfield Housing Market Area.</p> <p>The Welwyn Hatfield Local Plan examination is ongoing but the Planning Inspector has already indicated that it is the defined Welwyn Hatfield Housing Market Area, which he considers is the appropriate basis for considering the full OAHN and the degree to which the need for housing is being met within the defined WH HMA.</p> <p>We note the reference in your consultation document to the housing shortfall in Welwyn Hatfield and request that in line with the Duty to Cooperate, dialogue between Welwyn Hatfield and the South-West Hertfordshire authorities (including Dacorum Borough Council) continues to take place, on matters to do with housing land supply and the full OAHN.</p> <p>Welwyn Hatfield would also reiterate the matters raised, and the previous request made, in our letter to you on 3 August 2017. Welwyn Hatfield has agreed Memoranda of Understanding with a number of authorities, including Hertsmere, to explore where opportunities may exist to accommodate any of Welwyn Hatfield's shortfall against its OAN, (both within and beyond the plan period). However, at the current time, no other authority within the Welwyn Hatfield HMA has indicated that they can assist us with the identified shortfall in Welwyn Hatfield.</p> <p>Accordingly, and in response to your request for early notice, Welwyn Hatfield continues to request that Dacorum Borough Council considers if it is able to assist Welwyn Hatfield with meeting some of our housing shortfall as part of its plan preparation (within the context of the SW Herts HMA).</p> <p>With regards to the full OAHN for Dacorum and what is the appropriate figure, this will depend upon at what point the NPPF is updated and the approach taken to the standard methodology. If Dacorum considers it would be appropriate to use a figure derived from a SHMA, then this would need to be updated to reflect the latest population and household projections and should consider whether a higher uplift for market signals including any signs of worsening affordability would be more consistent with current practice (with reference to recent examination decisions).</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15263

<b>Full Name</b>	Caroline Manson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however I would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector</li> </ul>

suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and I would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper



	clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15315
<b>Full Name</b>	Mr Alan Conway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues &amp; Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q16,Q33,Q34, &amp; Q35 If the reality is that the proposals being made by St Albans impinge on Dacorum then an assessment of this should be included with a suitable caveat. I support the BRAG submission.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the</li> </ul>

evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes)

	<p>would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
<b>Include files</b>	

<b>Number</b>	Question 16
<b>ID</b>	LPIO15364
<b>Full Name</b>	Sue Wolstenholme
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p><b>Standard BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding</i> </li></ul>

*Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 61.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

**Include files**

<b>Number</b>	Question 16
<b>ID</b>	LPIO15399
<b>Full Name</b>	Paul de Hoest
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<ol style="list-style-type: none"> <li>1 I do not accept the underlying premise of this consultation that the Borough should plan for household growth rates of between 22% and 40%. The backing Government documents for this derive from 2012 ONS data which takes no account of the post-Brexit economic and migration expectations nor the recent flattening of life expectancy nor falling birth rates. The current Core Strategy already projects a 15% increase in households with building of 430 homes per year which is more than sufficient.</li> <li>2 It is simply wrong for local areas to be told what number of homes are required in each area.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15426
<b>Full Name</b>	Nick Hanling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within</p>

urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in

neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap



	of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15474
<b>Full Name</b>	Sarah and Nigel Tester
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding</p> <p>St Albans refusal to co-operate at this time, figures from that development should be incorporated which should</p>

amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local*

*housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15530
<b>Full Name</b>	Miss Tanya Assarat
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to</i> </li> </ul>

*determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15579
<b>Full Name</b>	Melanie Llewellyn

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be</i> </li> </ul>

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- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15646
<b>Full Name</b>	Mr James Honour

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific</i> </li></ul>



*Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt

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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

**Include files**

**Number**

Question 16

<b>ID</b>	LPIO15705
<b>Full Name</b>	Mark Pawlett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been</p>

proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

Include files	
Number	Question 16
ID	LPIO15753
Full Name	Maria & Colin Sturges
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p><b>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is</p>

clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in

	<p>the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15800
<b>Full Name</b>	David Kerrigan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p>This target is a full 11% higher than the 430 in the current Plan, and even that figure called for Green Belt release. But 476 is possible within the framework of 'urban capacity'. Also, DBC is not exploiting the freedoms it has to start with a figure for housing need, then revise it downwards for reasons of Green Belt, AONB, SSI etc. Even the Inspector was repeatedly stressing that the need figure does not dictate the housing target figure. DBC's mechanistic approach here is causing unnecessary harm, doing both itself and its citizens down. If it really wants to be inflexible, it should instead make sure east Hemel is included in DBC targets despite resistance from St Alban's.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban</li> </ul>

boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised

	<p>that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15867
<b>Full Name</b>	D B Land and Planning
<b>Company / Organisation</b>	D B Land and Planning
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• In terms of the housing need figure proposed in the Plan, DBLP's position is that the SHMA figure of 756 dwellings per annum is a reasonable starting point for development. In setting the figure, this has to be seen in the context of current government advice in the NPPF and the PPG</li> <li>• Paragraph 47 of the Framework requires LPAs to ensure that their Local Plans meets the full, objectively assessed needs for market and affordable housing in the housing market area. In terms of establishing what the OAN is in the HMA, the Council has prepared, jointly with other LPAs a SHMA to support its position. In terms of the emerging guidance on the standardised housing numbers methodology, the Government's figure of 602 is flawed as a basis for plan making and</li> </ul>



	<p>should not be relied upon for the following reasons:</p> <ul style="list-style-type: none"> <li>• The standardised methodology is currently in draft and still has to be finalised. Therefore, it attracts little weight. Furthermore, paragraph 46 of the DCLG consultation makes it clear that the government is encouraging development at levels over those derived from their standardised methodology</li> <li>• The proposed transitional arrangements in Table 1 of the document require the standardised methodology to only be used after the 31 March or publication of the revised Framework (whichever is the later). However, it is important to note the point made above about the standardised number being the 'floor' figure, with government encouragement for higher levels of house building</li> <li>• Therefore, the adopted the 602 dwellings per annum figure would be ill-informed and contrary to national guidance and the Government's consultation.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15924
<b>Full Name</b>	James Pitt
<b>Company / Organisation</b>	Gleeson Developments Limited
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p>Given the current stage of the Local Plan and the timetable for production, it is evident that the existing Core Strategy will be over 5 years old by the time that the Council is ready to formally submit its new Local Plan. Moreover, it has to be remembered that the adopted Core Strategy itself did not make adequate provision for new homes, hence the requirement that it be replaced by an early review, and so even though the Core Strategy is adopted and is currently less than 5 years old, the adopted plan is not one that is making appropriate provision for housing.</p> <p>Whatever the outcome of the current consultation on the standard methodology, it would be inappropriate for this Local Plan to proceed on anything other than the Government's new standard methodology, unless of course local evidence from the SHMA was indicating a higher figure than the standard methodology.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO15979
<b>Full Name</b>	Mr Robert Sellwood

<b>Company / Organisation</b>	The Crown Estate
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<p>On the basis of current evidence from the SW Herts SHMA, it is considered that 756 homes is the figure with the greatest evidential support. The lower figure of 602 homes is unlikely to meet the housing needs of the area and the higher figure of 1,000 to 1,100 may be difficult to achieve.</p> <p>However, the conclusion may be overtaken by the final housing need figures from the Government in the Spring of 2018.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16001
<b>Full Name</b>	Charlotte Ryan-Elliott
<b>Company / Organisation</b>	Kier Property
<b>Position</b>	Planner`
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>1 Dacorum's Housing Demand and Identified Supply</p> <ul style="list-style-type: none"> <li>The following chapter comments on Dacorum's Housing Demand and Identified Supply, as outlined on Pages 44 - 47 of the I&amp;O consultation draft. In commenting on this section of the I&amp;O, our Client draws on the key evidence base documents; as made available on Dacorum's</li> </ul> <p><b>Housing Demand / Need</b></p> <ul style="list-style-type: none"> <li>Dacorum are yet to establish what figure they will use as their housing need figure, with the adopted housing target based on the historically calculated Objectively Assessed Need ('OAN') from the 2003 Local Plan identifying a need for 430 homes per annum, the Joint Strategic Housing Market Assessment identifying a need for 756 homes per annum and the government's proposed new standard methodology stating that the housing need is 602 homes per annum, raising to circa 1,000/1,100 once the core strategy becomes out-of-date.</li> <li>Question 16 on page 46 of the I&amp;O draft asks which figure the Council should peruse, acknowledging that remaining with the adopted figure is not an option. The Council asks if 602, 756, 1,000/1,100 homes per annum or any other</li> </ul>

figure should be the housing target for the Borough. In response to this question we below assess the calculations for

#### Objectively Assessed Need- Joint SHMA

- In January 2016 GL Hearn produced a joint Strategic Housing Market Assessment ('SHMA') for Dacorum, Hertsmere, St Albans, Three Rivers and The five Local Authorities form a coherent and self-contained housing market area ('HMA') in which the Objectively Assessed Need ('OAN') for each borough is identified. The SHMA identifies that Dacorum has an OAN of 756 per annum across the SHMA period of 2013-36 - equating to a total need of 15,120 across the plan period. In this regard, we note that local planning authorities should seek to meet their full OAN, in accordance with the requirements of Paragraph 14 of the NPPF.

#### Objectively Assessed Need – Government's Standardised Approach

- In October 2017, the Government released a Housing White Paper for consultation. The Paper, 'Planning for the right homes in the right places', was accompanied by a spreadsheet setting out how the Council's proposed standardised methodology for calculating OAN would impact each Local Authorities need figures. The method, which is not yet adopted, calculated that the OAN for Dacorum would be 602 homes per annum, rising to 1,000/1,100 when the Core Strategy becomes out-of-date in 2018
- The calculation of 602 is based on an increase of 40% on the current housing target of 430 homes per However, the 40% cap is only applied because Dacorum have an up to date Core Strategy, come September 2018 the Core Strategy will become out-of-date and the cap will be removed, increasing the housing target to circa 1,000-1,100.
- The standardised methodology should be given great weight when considering the housing target for the emerging plan period and we do not consider it appropriate for the Council to aim for the lower provision, when the government have clearly established a greater need. As such, we consider the housing need to be 22,000 across the 20 year plan period.
- In addition to considering the Government's proposed OAN of 1,000-1,100 to be most appropriate reflection of housing need, we ask that the Council to introduce a number of other factors, set out below, which set out why the Council should seek to deliver in excess of the identified need.

#### *Meeting Demand outside the District - Duty to Co-operate*

- Furthermore, our Client notes that the OAN does not yet seek to meet any unmet need arising from elsewhere in the HMA-which consists of Dacorum, Hertsmere, St Albans,

Three Rivers and Watford. In this regard, we note that the Joint SHMA indicates a need for 72,473 new homes to be delivered between 2013-2036 across the HMA (equating to 3,151 homes per annum). The highest need is recorded in Dacorum (756 per annum) followed by; St Albans (705 per annum), Hertsmere (599 per annum), Watford (577 per annum) and Three Rivers (514).

Table 1 below identifies the breakdown in housing need across the HMA. Source: Strategic Housing Market Assessment (2016).

**DA N fo r Housin g - Pe r Annum, 2013-36**

**Dacorum**

**756**

**H!ltsmer e**

**599**

**St Albans**

**705**

**Throo Rivers**

**514**

**W atford**

**577**

**HMA**

**3,151**

*Hertsmere*

1.3. Hertsmere Council are currently consulting on their Issues and Options emerging Local Plan. The I&O draft consultation document states that Hertsmere have a housing demand/need (including affordable housing) of 9,000 new homes across the 15 year plan period of the new Local Plan (to 2034) - equating to the delivery of 600 homes per annum. Hertsmere also outline that they have an identified supply of 3,000 homes, leaving a residual (unmet) demand of 6,000 homes (equating to the delivery of 400 homes per annum). At present Hertsmere look to plan for their full OAN (based on the findings of the Joint SHMA).

- Hertsmere are yet to identify how they will deliver their full need and as such it may be reasonable to consider that Dacorum may be tasked with picking up some unmet need, if suitable sites are not identified within the Borough

*St Albans*

The latest position is that St Albans will now seek to re-start the Local Plan process, relying heavily on their historic evidence base. The Council aim to approve a new I&O Local Plan draft at Cabinet in November 2017 and start the public consultation in January 2018. At present Members have

approved the housing need figure of 913 dwellings per annum based on the latest Housing White Paper consultation: Planning for the right homes in the right places which set out a new methodology for calculating OAN.

- Whilst the proposed housing target demonstrates a significant increase in housing targets, the figure is not robust as it has not been tested in any meaningful way. The fact remains that the Council's revised figures relate only to a consultation process, which is still on-going. Recent appeal decision relating to Land at the South of Dalton Heights, Durham (APP/X1355/W/16/3165490) found the consultation draft OAN calculation figure is not to be relied upon.
- In any event St Albans are yet to produce any evidence or a strategy as to how they plan to deliver 913 homes per annum and it is anticipated that it will be some time before this strategy is agreed. Given the historic undersupply of houses in St Albans and the very early status of their revised Local Plan it is justifiable that Dacorum should help St Albans in the delivery of their full OAN

#### *Three Rivers*

- Three Rivers District Council are also at the very early stages of producing their Local Plan, running their I&O (Regulation 18) consultation between 28th July 2017 - 8th September 2017. At present, it is understood that the Council are compiling the responses.
- The latest Housing Land Supply Update states that the Council have a need for 146 dwellings per annum and have historically delivered marginally above this rate (2011/12: 185, 2012/13: 176, 2013/14: 142, 2014/15: 285 and 2015/16: 215). However, the Joint SHMA: January 2016 identifies an OAN of 514 dwellings per annum. Accordingly, it is understood that Three Rivers will have to significantly increase their housing delivery to address their increased need. It is likely to cause some difficulty to the Council, delivery at these significantly increased rates, and as such we once again consider it justifiable that Dacorum take this into account when determining their housing target

#### *Watford*

- Watford are producing a two part Local Plan. Part one depicts the overarching strategy and is at the very early stages prior to Regulation 18 consultation. The Part two Local Plan outlines the site allocations and development management policies and is

	<p>due to be adopted in January 2018. Annual completions are as follows 2011/12: 322, 2012/13: 357, 2013/14: 316, 2014/15: 167 and 2015/16:</p> <p>220. Comparing the completion rates to the latest Joint SHMA OAN calculations (577 dwellings per annum) it appears the Council will have to significantly increase their delivery during the course of the next plan period. Once again, this is suitable evidence to request Dacorum acts accordingly to help deliver as much housing as possible to meet the need</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16003
<b>Full Name</b>	Charlotte Ryan-Elliott
<b>Company / Organisation</b>	Kier Property
<b>Position</b>	Planner`
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><u>Housing Demand Findings</u></p> <p>1.1. On review of the boroughs within the HMA, it is evident that Dacorum will likely be required to assist in accommodating any unmet housing need arising from the other boroughs. Therefore, we would strongly encourage Dacorum to engage positively with other authorities to ensure that need arising from the HMA (or potentially the wider area - including London) is at least in part accommodated by Dacorum (in accordance with the requirements of the NPPF; 'Duty to Cooperate'). Indeed, as proven by recent Local Plan Examinations, notably Waverly and Mid Sussex, it is a requirement to meet a significant element of any un-met housing need carried from neighbouring boroughs; with the Inspector for the Mid Sussex District Plan concluding that 'it would be unsound for Mid Sussex to fail to accommodate a significant portion of unmet housing need arising from its neighbours within the same housing market area in its emerging District Plan. The housing requirement within the draft Plan should therefore be increased accordingly.' Consequently, there is a precedent set for Dacorum to explore all reasonable options to facilitate the adoption of a housing requirement that includes an appropriate portion of any unmet need within the HMA.</p> <p>At present, our Client notes that there is a lack of detail provided within the I&amp;O draft regarding how Dacorum will work with its partners in the HMA, which we would duly request Dacorum to explore in further detail before progressing the new Local Plan and adopting a housing target (which should be based on robust, up-to-date evidence). In accordance with Paragraphs 47 and 182 of the NPPF, our Client notes that Dacorum would need</p>

	<p>to provide sufficient justification as to why it cannot accommodate at least a portion of any unmet need that may arise from within the HMA, during the preparation of the emerging Local Plan. This would likely only require a modest increase in Dacorum's minimum requirement and thus would not necessitate a fundamental adjustment to the proposed spatial strategy, but importantly would ensure the needs of the wider HMA are met in full</p> <p>In summary, we advise that Dacorum seeks to increase their housing target to accommodate: the expected shortfall arising from within the HMA; in addition to helping to address London's housing shortfall (in line with the adopted London Plan; as consolidated with alterations since 2011). On behalf of our Client, we would request that this is considered/explore before Dacorum commence on preparing the next stage of the Local Plan.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16010
<b>Full Name</b>	Charlotte Ryan-Elliott
<b>Company / Organisation</b>	Kier Property
<b>Position</b>	Planner`
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>As set out in Chapter 2 of this report, we consider it essential that the Council seek to deliver the highest housing target, that identified by the Housing White Paper, without the 40% cap. We consider the housing target of 1,100 is most appropriate and will make the greatest impact on working to resolve the significant housing shortfall faced by Please refer to Chapter 2 of this report for full justification for this approach.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16016
<b>Full Name</b>	Charlotte Ryan-Elliott
<b>Company / Organisation</b>	Kier Property
<b>Position</b>	Planner`
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

<b>Your response - Please add your response here</b>	As discussed above, whilst we are supportive of Dacorum's intentions to prepare a new Local Plan, we encourage the Council to take account of the points we have raised in order to ensure that the new Local Plan seeks to deliver an appropriate level of housing growth which fully meets the District's Objectively Assessed Needs - recognising that brownfield sites should be utilised to their full potential in the delivery of housing.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16058
<b>Full Name</b>	Dave Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is</p>



clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in

	<p>the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16112
<b>Full Name</b>	Helen and Aaron Talbot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes</p>

calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgfield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference

	<p>in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16171
<b>Full Name</b>	Stuart Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16228
<b>Full Name</b>	Stuart Mears
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</b></p> <p><b>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p>

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	<p>consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16289
<b>Full Name</b>	Kitty Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>please find the attached report written on mine and other residents request.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements</p>



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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16351
<b>Full Name</b>	Aaron Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I support GFRA responses see below.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16398
<b>Full Name</b>	Ruth and Stephen Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you</b></p>

**accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.**

However, we would like to take this opportunity emphasize just a few of the most important points within that response.

Q 16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should

	<p>be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> <li>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16464
<b>Full Name</b>	Andrew Yeomans
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the</p>

five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgfield test is considered



	<p>appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16540
<b>Full Name</b>	Ian Emmas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>D) 476 Urban Capacity</b></p> <p>. It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper</p>

consideration of increased density including taller buildings in appropriate areas would release more capacity.

. The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*"

Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

. One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in

projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

. DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.

. 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16730
<b>Full Name</b>	Martin Ephgrave
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula

<b>Your response - Please add your response here</b>	The Council should choose the highest level of growth for Dacorum, to seek to address the pressing need for new homes that exists in the Borough
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16745
<b>Full Name</b>	Martin Ephgrave
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p>It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that the council should, therefore, plan for a minimum of 756 dwelling per year. However, the Council also need to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, at least one year before the date that the new Local Plan is due to be adopted. Under the Government's draft standard formula the calculation of housing need increases to 1,100 homes a year.</p> <p>This approach will ensure that in the event that the new higher growth level is introduced as planned, Dacorum will have sufficient sites to provide for the housing growth required. In the event that the new formula not introduced before the new Local Plan is adopted, the council can fall back on the SHMA figure of 756 dwelling per year.</p> <p>If the new higher figure is not planned for now, and the new standard formula is introduced as planned, this would leave the Council in a very vulnerable position at the submission or examination stage of the local plan, as it could not comply with the test of soundness. Paragraph 47 of the NPPF requires that Local Plans meet the <u>full</u>, objectively assessed needs for market and affordable housing, which could be 1,100 homes a year at that time).</p> <p>If the new standard formula is introduced, but not planned for, this would inevitably delay the adoption of the emerging local plan. Without an up to date Local Plan, paragraph 14 of the NPPF would be engaged, and the council would be less able to control the location of new housing development in the Borough. It is therefore important that the council plan to meet the current minimum figure of 756 dwelling per year and also the proposed higher figure of 1,100 homes a year.</p> <p>It is not appropriate for the Council to planning for less than 756 dwelling per year, as this represents the current most up to date assessment of housing need. As noted above, paragraph 47 of the NPPF requires that Local Plans meet the <u>full</u> objectively assessed housing need.</p>

	<p>The consultation document asks for views on whether the council should provide for only 600 homes per year. However, this figure is only 40% of actual need (based on the new methodology) and only applies for a limited time until Sept 2018 when the Core Strategy will be 5 years old. After this time, the full 1,100 homes a year will be required, so the emerging local plan will need to plan for this higher level of growth.</p> <p>For the above reasons, the emerging local plan needs to plan for a <u>minimum</u> of 756 dwellings per year and a <u>maximum</u> of 1,100 dwelling per year.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16823
<b>Full Name</b>	Jon G. Wright Dawn Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p>

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In

	<p>this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16891
<b>Full Name</b>	Jan Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need</p>

stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through



	<p>the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16953
<b>Full Name</b>	Terry Godber
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>It seems the current plans are only responding to the increased housing demands being generated from central government offices and based on published information they seem to take scant account of the social and society issues outlined above.</li> </ul> <p>Why is this?</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO16979
<b>Full Name</b>	Chris Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year

Your response - Please add your response here

Please register my support for this report by Grove Fields Residents Association.

I support this whole heartedly.

**GFRA Response to Question 16, full document attached to question 46**

**1 Governments draft figure 602**

It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

It was accepted in *King's Lynn and West Norfolk (2015) 16* on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that

could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgfield test to be undertaken. The application of the Sedgfield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17036
<b>Full Name</b>	Jade Holmes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.</p> <p>In the intervening period the government have published "<i>Planning for the right homes in the right places</i>" which provide a calculation approach that can be applied for</p>

the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17093
<b>Full Name</b>	Grahame Senior
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.</p>

In the intervening period the government have published “*Planning for the right homes in the right places*” which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum’s limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgfield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgfield test to be undertaken. The application of the Sedgfield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council’s Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17202
<b>Full Name</b>	Watford Borough Council

<b>Company / Organisation</b>	
<b>Position</b>	Principal Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Question 16.</p> <p>In line with the work already undertaken by Dacorum Borough Council, Watford Borough Council has asked the community and stakeholders if there were any that were potentially suitable for development as part of a 'call for sites' consultation in 2016. Following on from this, the Council is currently working on a Housing and Employment Land Availability Assessment. This is expected to be completed in 2018. This work will contribute towards our understanding of what type of new development can be delivered in Watford and how this may contribute to the wider south west Hertfordshire area.</p> <p>A key issue the Housing and Employment Land Availability Assessment is seeking to resolve is to determine if there is enough land available to support the growth required in the Borough to 2036 (the new Watford Local Plan will cover the period 2016-2036). Should there be capacity constraints identified when this work is completed Watford Borough Council will be looking to discuss, collaboratively with neighbouring local authorities, how the issue(s) can be addressed and the implications this may have.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17226
<b>Full Name</b>	Debbie Crooks Pam Moss
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering</p>



all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure,

environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it

	<p>becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17283
<b>Full Name</b>	Margaret and Andrew Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</b></p> <p>...</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the</li> </ul>

housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT

	<p>indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP1017340
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>...</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations</p>

of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgfield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is

	<p>referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17392
<b>Full Name</b>	Lesley Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 16 below (copy of full response attached to question 46)</p> <p><b>Question 16</b></p> <p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>1 <b>D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</b></p> <ul style="list-style-type: none"> <li>• The starting point should be the Urban Capacity that doesn't require any Green Belt release</li> <li>• The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller</li> </ul>

	<p>buildings in appropriate areas would release more capacity</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17447
<b>Full Name</b>	Sara Bell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p>



In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional

	<p>homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17506
<b>Full Name</b>	Emma Talbot
<b>Company / Organisation</b>	The Little Cloth Rabbit
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>Please find attached a report (GFRA) about the proposed development of Tring.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land</p>

should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

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	<p>substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p> <p>...</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17554
<b>Full Name</b>	MR DAVID BROWN
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 16 below (copy of full response attached to question 46)</p> <p><b>Question 16</b></p> <p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>1 <b>D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</b></p>

	<ul style="list-style-type: none"> <li>• The starting point should be the Urban Capacity that doesn't require any Green Belt release</li> <li>• The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17613
<b>Full Name</b>	Paul Hembury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning &amp; Development details my concerns comprehensively.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line</p>

with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

It was accepted in *King's Lynn and West Norfolk (2015) 16* on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A

	<p>of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17647
<b>Full Name</b>	Guinness Partnership
<b>Company / Organisation</b>	Guinness Partnership
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p><b>Question 16: Which figure of housing do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>In the calculations for local housing need, the conclusion from the SHMAA is that Decorum needs 756 houses a year producing a total of 17,388 over the Plan period 2013-2036.</p>

	<p>This conclusion has been overtaken by the DCLG's White paper on meeting housing need where it is stated that Dacorum should accommodate 1,000- 1,100 homes per year. This is the figure that should be used.</p> <p>The reason the new DCLG figure of 1,000-1,100 houses per year should be used is because this new Local Plan to 2036 will not be adopted until 2019 and the Plan will not be submitted until 2018, which is the Government cut- off for adopting the higher housing figures.</p> <p>In terms of the distribution of new housing, the organic peripheral expansion of major settlements should continue. This is not 'urban sprawl' and Green Belt boundaries should be adjusted to meet such requirements over a long- term (25-year) period. Medium-sized settlements such as Markyate should be expanded outside the Green Belt to a level that sustains a 2FE primary school. New landscaping will be required to soften views from the AONB.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17687
<b>Full Name</b>	Michael and Jill Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in</p>



paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

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In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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	<p>It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17736
<b>Full Name</b>	Diana Woodward
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express.</p> <p>BCA response to Question 16 below - full document attached to Question 46</p> <p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>1 <b>D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</b></p> <ul style="list-style-type: none"> <li>• The starting point should be the Urban Capacity that doesn't require any Green Belt release</li> <li>• The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller</li> </ul>

	<p>buildings in appropriate areas would release more capacity.</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17792
<b>Full Name</b>	John and Helen Osborne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the</p>

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	<p>appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17850
<b>Full Name</b>	David and Jane Elsmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p>

It was accepted in *King's Lynn and West Norfolk (2015)* 16 on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into

	<p>consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17908
<b>Full Name</b>	Dave Davies
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plants for additional building in the Tring area.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line</p>

with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013)* 14 and *Gallagher Estates (2014)* 15.

It was accepted in *King's Lynn and West Norfolk (2015)* 16 on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

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As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A



	<p>of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO17964
<b>Full Name</b>	Mr Michael Burbidge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	I believe that the house building figures in the plan do more than meet the needs of the local population and the that the government should look at a plan which regenerates other less economically affluent areas of the UK rather than pulling people to London and the South East. This may not be a matter for Dacorum but

	the MP for Tring is a minister in the Treasury so does have some influence on this.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18017
<b>Full Name</b>	mr Richard Lambert
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMEMNT) , my own views can be summarised in a handful of bullet point.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they</p>

may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

	<p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	

Number	Question 16
ID	LPIO18088
Full Name	Mr Graham Bright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such</p>

therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local*

	<i>Government and Elm Park Holding Ltd (2015) EWHC 2464</i>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18145
<b>Full Name</b>	Peter and Cathy Davidson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt</p>

and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

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*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*



	16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18202
<b>Full Name</b>	Nicky and Dave Hulse
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Please see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply</p>

requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18255
<b>Full Name</b>	Gail Skelton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.</p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states <i>“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of</p>

the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to

be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18315
<b>Full Name</b>	Terry and Jennifer Elliott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>We are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This</p>

has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published “*Planning for the right homes in the right places*” which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum’s limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council’s Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18348

<b>Full Name</b>	Plato Property Investments LLP
<b>Company / Organisation</b>	Plato Property Investments LLP
<b>Position</b>	C/O Aitchison Rafferty
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p>This Statement has been prepared to respond to the questions set out in the Issues and Options Consultation published by the Council in November 2017. It is submitted on behalf of Plato Property investments LLP in respect of a site located to the south east of the Mini dealership at London Road, Cow Roast HP23 5RE.</p> <p>This Statement should be read along with the Planning Statement attached at <b>Appendix 1 (see Q 46 for attachment)</b> which sets out the detailed planning case in support of the allocation of the site for housing in the emerging Local Plan.</p> <p>In summary, we consider that:</p> <p>The Council should choose the highest level of growth for Dacorum, to seek to address the pressing need for new homes that exists in the Borough</p> <ul style="list-style-type: none"> <li>The proposed housing site to the south east of Mini Dealership, London Road, is considered to be one of the more sustainable locations within the 'Rest of the Borough'. It is on the edge of the existing built up area, adjacent to a village pub, a local shop and employment opportunities, is well served by bus routes and also offers the ability to cycle safely along the tow path. It is also much close to the larger settlements of Berkhamsted and Tring than other settlements in the rural area.</li> </ul> <p>The site has a capacity to provide a mixed used development of up to 28 new homes, in an attractive design sympathetic to its canal side setting incorporating canal boat moorings at a more sustainable location within the Rural Area compared to other smaller settlement, and would provide a significant contribution to local housing need.</p> <p>It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that the council should, therefore, plan for a minimum of 756 dwelling per year. However, the Council also need to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, at least one year before the date that the new Local Plan is due to be adopted. Under the Government's draft standard formula the calculation of housing need increases to 1,100 homes a year.</p> <p>This approach will ensure that in the event that the new higher growth level is introduced as planned, Dacorum will have sufficient sites to provide for the housing growth required. In the event that the new formula not introduced</p>



before the new Local Plan is adopted, the council can fall back on the SHMA figure of 756 dwelling per year.

If the new higher figure is not planned for now, and the new standard formula is introduced as planned, this would leave the Council in a very vulnerable position at the submission or examination stage of the local plan, as it could not comply with the test of soundness. Paragraph 47 of the NPPF requires that Local Plans meet the full, objectively assessed needs for market and affordable housing, which could be 1,100 homes a year at that time).

If the new standard formula is introduced, but not planned for, this would inevitably delay the adoption of the emerging local plan. Without an up to date Local Plan, paragraph 14 of the NPPF would be engaged, and the council would be less able to control the location of new housing development in the Borough. It is therefore important that the council plan to meet the current minimum figure of 756 dwelling per year and also the proposed higher figure of 1,100 homes a year.

It is not appropriate for the Council to planning for less than 756 dwelling per year, as this represents the current most up to date assessment of housing need. As noted above, paragraph 47 of the NPPF requires that Local Plans meet the full objectively assessed housing need.

The consultation document asks for views on whether the council should provide for only 600 homes per year. However, this figure is only 40% of actual need (based on the new methodology) and only applies for a limited time until Sept 2018 when the Core Strategy will be 5 years old. After this time, the full 1,100 homes a year will be required, so the emerging local plan will need to plan for this higher level of growth.

For the above reasons, the emerging local plan needs to plan for a minimum of 756 dwellings per year and a maximum of 1,100 dwelling per year.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18459
<b>Full Name</b>	Mrs Wendy Mclean
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>We must oppose any request which falls outside the HMA. Why should we even consider gifting our green belt to another Council which is not a neighbour. London should definitely not be considered.</p> <p>Why on earth should Dacorum support the inevitable density overcrowding by permitting Green belt for</p>

	development for Londoners in preference to indigenous population.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18483
<b>Full Name</b>	Melanine Llewellyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> <li>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific</i> </li> </ul>

*Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

**Include files**

**Number**

Question 16

<b>ID</b>	LPIO18529
<b>Full Name</b>	Mrs Juliet Chodzko
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>I should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.</b></p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific</i> </li></ul>

*Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
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**Include files**

**Number**

Question 16

<b>ID</b>	LPIO18576
<b>Full Name</b>	Captain Andrew Cassels
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</b></p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to</i> </li> </ul>

*determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18622
<b>Full Name</b>	Lindy Weinreb

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p><b>1 D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</b></p> <ul style="list-style-type: none"> <li>The starting point should be the Urban Capacity that doesn't require any Green Belt release</li> <li>The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.</li> <li>6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</li> </ul>
Include files	
Number	Question 16
ID	LPIO18669
Full Name	Hilary Abbott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).



Your response - Please add your response here

**The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.**

**However, I would like to take this opportunity emphasize just a few of the most important points within that response.**

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**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper

consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18715
<b>Full Name</b>	Paul and Gillian Jenkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However, the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes, Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy</p>

constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

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**1 D) 476 Urban Capacity**

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- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the

right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt

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- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum

	plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18761
<b>Full Name</b>	Berkhamsted Citizens
<b>Company / Organisation</b>	Berkhamsted Citizens
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>1 <b>D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</b></p> <ul style="list-style-type: none"> <li>The starting point should be the Urban Capacity that doesn't require any Green Belt release</li> <li>The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.</li> <li>6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18809

<b>Full Name</b>	Lyndsay Slater
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18857
<b>Full Name</b>	Andrew and Margit Dobbie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18903
<b>Full Name</b>	Katherine Cassels
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</b></p> <p>...</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the</li> </ul>

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<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18944
<b>Full Name</b>	Rupert Symmons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	....
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO18981
<b>Full Name</b>	Mrs Emma Robertson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>Please find attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</b></p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage</p>

Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

It was accepted in *King's Lynn and West Norfolk (2015) 16* on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

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	<p>As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19044
<b>Full Name</b>	Barbara Gainsley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>I attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</b></p>



Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.

Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.

**1 D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure**

- The starting point should be the Urban Capacity that doesn't require any Green Belt release
- The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.
- 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19101
<b>Full Name</b>	Bill Ahearn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year

Your response - Please add your response here

I wish to register my objections to some of the proposals under consideration on the grounds they are simply too excessive and feel a more moderate scheme as set out in the attached report would be suitable

**GFRA Response to Question 16, full document attached to question 46**

**1 Governments draft figure 602**

It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

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In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that

could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19159
<b>Full Name</b>	Ms Sarah Hain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This</p>

has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published “*Planning for the right homes in the right places*” which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19217

<b>Full Name</b>	Grove Fields Residents Association
<b>Company / Organisation</b>	Grove Fields Residents Association
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN</p>

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In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

Include files	
Number	Question 16
ID	LPIO19274
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	<p>Our family ( 4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town's infrastructure. We feel strongly that green belt land should be preserved for future generations.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p>



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	<p>this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19307
<b>Full Name</b>	Richard House
<b>Company / Organisation</b>	Gladman Development Limited
<b>Position</b>	Policy Planner
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p>The National Planning Policy Framework (NPPF) has brought about fundamental changes to the planning process since its inception. One such change relates to the need to significantly boost the supply of housing and how this fundamental requirement of the Framework should be reflected in the plan making process. Gladman, who operate on a national basis, has considerable experience in contributing to the Local Plan preparation process since the NPPF came into effect.</p> <p>What continues to be clear from this experience is that many local authorities are not fully addressing the requirements of the Framework when preparing their Local Plans, this has led to significant concerns being expressed by Inspectors on the soundness of their plans in their current form.</p> <p>Issue 8 How many new homes need to be provided by 2036?</p> <p>Gladman considers that the Dacorum Local Plan should provide for between 1,000 and 1,100 dwellings per annum in accordance with the Government's proposed standardised assessment of housing need. It is important that the Local Plan, through delivering housing growth, it addresses the issue of affordability. The latest affordability ratios published by ONS indicates a lower quartile affordability rate of 11.13 for Dacorum. Affordability is clearly an issue and a significant increase in housing growth is necessary to begin to address this problem.</p> <p>Any issues of unmet housing need arising from relevant neighbouring local authorities must be fully considered through the preparation of the Local Plan, working under</p>

	<p>the auspices of the 'duty to cooperate'. To achieve this, it is vital that this matter is carefully explored through joint working with all other local planning authorities within the Housing Market Area (HMA), together with any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary, a strong policy mechanism will be required within the Local Plan to demonstrate that unmet housing needs arising from relevant neighbouring authorities and those with a clear functional relationship will be met during the plan period.</p> <p>The need to tackle any issues of unmet housing need through the plan-making process was highlighted in an appeal decision at Land off Watery Lane, Curborough, Lichfield which was recovered by the Secretary of State and determined in a letter dated 13 February 2017<sup>1</sup>. At paragraph 40 of the Secretary of State's decision letter, the distinct possibility of Lichfield having to provide for a proportion of Birmingham's unmet housing needs through the local plan making process is highlighted:</p> <p><i>... while there is a distinct possibility of Lichfield having to provide for some of Birmingham's housing need, there is a mechanism for a review in the Local Plan and it would be inappropriate now to speculate on any contribution by Lichfield. As such the Secretary of State agrees that this should not be considered when assessing the merits of this appeal scheme.</i></p> <p><i>Although it was considered inappropriate to speculate on any contribution towards Birmingham's unmet needs within Lichfield in the context of an appeal made under Section 78 of the Town and Country Planning Act 1990, this decision makes it clear that any issues of unmet development needs must be addressed through the local plan making process.</i></p> <p>1 Land and Buildings off Watery Lane, Curborough, Lichfield (Appeal Reference APP/K3415/A/14/2224354)</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19328
<b>Full Name</b>	Stuart, Miranda & Melissa Kay
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This*

*means that the level of housing set out in a plan may be lower or higher than the local housing need.”* DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co- operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he

requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas

	<p>would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> <li>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19376
<b>Full Name</b>	Wai Tang and Greg Barfoot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Please note we are aware that the Berkhamsted Residents Action Group (BRAG) has responded in full to the "Issues &amp; Options" consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.</p> <p>We wish to add our concerns to the DBC local plan issues and options consultation.</p> <p>We are particularly concerned about the following</p> <p>Q16, Q33, Q34 &amp; Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities " through the duty to co-operate " to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC</p>

figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the "draft Government figure". In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be*

*accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19424
<b>Full Name</b>	Philippa Jones



Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p>I enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan</p> <p><b>Question 16</b></p> <p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>1 <b>D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</b></p> <ul style="list-style-type: none"> <li>The starting point should be the Urban Capacity that doesn't require any Green Belt release</li> <li>The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> <li>DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.</li> <li>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</li> </ul>
Include files	
Number	Question 16
ID	LPIO19479
Full Name	John Wignall
Company / Organisation	
Position	
Agent Name	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.</p>

In the intervening period the government have published “*Planning for the right homes in the right places*” which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum’s limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council’s Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19536
<b>Full Name</b>	Kevin Cullen

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	<p>Please refer to the attached report.(BRAG)</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This</p>

has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

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It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council’s Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19594

Full Name	Mark Lawson and Sharon Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	<p>I do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that.</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a</p>

questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

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	<i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19650
<b>Full Name</b>	Vivienne Inmonger
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p>



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In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

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	<p>this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19709
<b>Full Name</b>	John Inmonger
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes</p>

calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

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	<p>in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19763
<b>Full Name</b>	Ben Barth
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p><b>Question 16</b></p> <p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>1 <b>D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</b></p> <ul style="list-style-type: none"> <li>• The starting point should be the Urban Capacity that doesn't require any Green Belt release</li> <li>• The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should</li> </ul>

	<p>be incorporated which should amount to a minimum of three years housing supply.</p> <ul style="list-style-type: none"> <li>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19801
<b>Full Name</b>	Mrs Sagar Patel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	It's fair to say there is a vast shortage of housing in the area and I agree new affordable housing needs to be provided to cater for the needs of the community
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19832
<b>Full Name</b>	Jon Esson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage</p>

Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

It was accepted in *King's Lynn and West Norfolk (2015) 16* on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

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In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

	<p>As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19916
<b>Full Name</b>	Chris Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	I am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA )

**GFRA Response to Question 16, full document attached to question 46**

**1 Governments draft figure 602**

It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

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	<p>nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.</p> <p>As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgfield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgfield test to be undertaken. The application of the Sedgfield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO19973
<b>Full Name</b>	mrs sue van rhee
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year

**Your response - Please add your response here**

Please find attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..

**GFRA Response to Question 16, full document attached to question 46**

**1 Governments draft figure 602**

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the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20030
<b>Full Name</b>	Kate and Ben Marston
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>As residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that</p>

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*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

**Include files**

**Number**

Question 16

<b>ID</b>	LPIO20087
<b>Full Name</b>	Maurice and Christine O'Keefe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>We are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p>.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a</p>

questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

	<i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20144
<b>Full Name</b>	Sherry and Haydn Bond
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Please find attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they</p>



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	<p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20202
<b>Full Name</b>	Dianne Pilkington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member. I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p>

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	<p>homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20250
<b>Full Name</b>	Mr Peter Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban</li> </ul>

boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised

	<p>that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20305
<b>Full Name</b>	David Clarke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>The attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already</p>

been allocated within the Local Plan and have yet to be fully delivered.

Please accept this email and the attached report as my feedback on the proposed development of Tring.

**GFRA Response to Question 16, full document attached to question 46**

**1 Governments draft figure 602**

It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

It was accepted in *King's Lynn and West Norfolk (2015) 16* on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

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2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

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*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

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*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20363
<b>Full Name</b>	Deborah Turnbull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	



Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	<p>I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.</p>

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*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20411
<b>Full Name</b>	Jane Collis

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I would like to express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be</i> </li> </ul>

*accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20472
<b>Full Name</b>	Mr David Parker

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	<p>I am writing in response to the Issues and Options consultation.</p> <p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt</p>

and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

	<i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20520
<b>Full Name</b>	DR Brigitta Case
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I have attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the <b>Berkhamsted Citizens' Association</b> and the <b>Berkhamsted Residents Action Group</b>. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p>1 <b>D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based</li> </ul>

on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with



increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.

- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Berkhamsted Citizens response

**Question 16**

**Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?**

**1 D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure**

- The starting point should be the Urban Capacity that doesn't require any Green Belt release
- The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.
- 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.

**Include files**

**Number**

Question 16

<b>ID</b>	LPIO20567
<b>Full Name</b>	Christine Manning
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><b>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b></p> <p>1 <b>D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</b></p> <ul style="list-style-type: none"> <li>• The starting point should be the Urban Capacity that doesn't require any Green Belt release</li> <li>• The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20605
<b>Full Name</b>	Ailsa Davis
<b>Company / Organisation</b>	HCC Development services, Property , Resources
<b>Position</b>	Principal Planning Officer

<b>Agent Name</b>																																									
<b>Company / Organisation</b>																																									
<b>Position</b>																																									
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).																																								
<b>Your response - Please add your response here</b>	<p>As a landowner, HCC makes no comment on the Whatever figure is selected by DBC the most sustainable locations, (as defined in the Sustainability Note), to provide housing should be released.</p> <p>Particular emphasis should be made to those sites which also offer the potential to meet the infrastructure needs arising from the development strategy. In so doing the Local Planning Authority can roll forward the strategy from the Core Strategy 2013 and ensure that the most suitable, available and deliverable sites deliver housing/employment and infrastructure, including additional school capacity.</p> <p>The potential interrelationship between settlements in requiring infrastructure, and consequently the solutions to delivering that infrastructure should also be considered. [For example, in relation to the additional secondary school capacity which might be required to meet needs arising in Berkhamsted and Tring which seems likely under all but option 1A and 1B – see question 8 above]. copy below</p> <p>From a planning perspective, simply looking at the numbers associated with each of the growth options, it is worth noting that for Berkhamsted and Tring, any option other than option 1A or option 1B will require additional secondary school capacity.</p> <p><b>Summary of housing numbers in each Growth Option:</b></p> <table border="1"> <thead> <tr> <th>Hemel Kings Hempstead Borough</th> <th>Berkhamsted Markyate</th> <th>Tring Rest of</th> <th>Bovingdon Total</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td>Langley</td> </tr> <tr> <td colspan="4"><b>Identified housing capacity*</b></td> </tr> <tr> <td></td> <td></td> <td></td> <td>8,900</td> </tr> <tr> <td></td> <td></td> <td></td> <td>600</td> </tr> <tr> <td></td> <td></td> <td></td> <td>500</td> </tr> <tr> <td></td> <td></td> <td></td> <td>90</td> </tr> <tr> <td></td> <td></td> <td></td> <td>50</td> </tr> <tr> <td></td> <td></td> <td></td> <td>200</td> </tr> <tr> <td></td> <td></td> <td></td> <td>600</td> </tr> </tbody> </table>	Hemel Kings Hempstead Borough	Berkhamsted Markyate	Tring Rest of	Bovingdon Total				Langley	<b>Identified housing capacity*</b>							8,900				600				500				90				50				200				600
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			600																																						

10,940

**Growth options – Green Belt housing numbers**

**Option 1 – Draft Government figure**

**Option 1A**

1,750

900

300

-

-

-

-

2,950

**Option 1B**

2,980

-

-

-

-

-

-

2,980

**Option 1C**

-

1,075

1,000

410

280

160

-

2,925

**Option 2 – Locally assessed need**

**Option 2A**

3,675

1,175

1,600

130

-

-

-

6,580

**Option 2B**

4,150

1,075

1,350

-  
-  
-  
-  
6,575  
**Option 2C**  
3,450  
1,075  
1,000  
360  
380  
160  
155  
6,580  
**Option 3 - Upper Government figure**

**Option 3**  
6,850  
2,250  
2,667  
435  
950  
600  
608  
14,360

*\* This figure is the same for each Growth Option and needs to be added to the Green Belt housing numbers to give the total growth for each place*

*Source : Growth Options – DBC Issues and Options consultation Nov 2016*

The capability of Dunsley Farm to provide additional secondary school capacity (at the most sustainable location in Tring to accommodate development according to the Council's own Sustainability note) has been tested and found to be deliverable at a high level in Highways terms. The site has also been the subject of Landscape and Visual Impact assessment, (see separate call for sites 2017 submission).

*We would welcome further discussions with the Local Planning Authority relating to the contribution which could be made by the site towards meeting the aspirations of the emerging Local Plan.*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LP1020639
<b>Full Name</b>	Jane Hawkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I am writing with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk (2015)</i> that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This</p>

has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published “*Planning for the right homes in the right places*” which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum’s limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council’s Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

**Include files**

<b>Number</b>	Question 16
<b>ID</b>	LPIO20695
<b>Full Name</b>	Keiron Wybrow
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Please find attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a</p>



questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

	<i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20743
<b>Full Name</b>	Christopher Townsend
<b>Company / Organisation</b>	
<b>Position</b>	Councillor, Tring Town Council
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)</p> <p>The locally assessed housing need figure (756) fails to take into account the constrained nature of land availability in Dacorum because of Green Belt and A.O.N.B.</p> <p>A figure should be derived that reflects the ability of the Borough to deliver the housing growth and the necessary infrastructure (“organic growth”). Whilst respecting the Government’s policy to provide a major boost to the housing market, a blanket imposition of a target without consideration of local circumstances is irresponsible.</p> <p>As an example of the alternative basis suggested, the following calculation is based upon the assumption that the maximum number of houses that each group in the settlement hierarchy can take sustainably is the minimum figure quoted in option 1:</p> <ul style="list-style-type: none"> <li>• 1,750 Hemel Hempstead Option 1A</li> <li>• 1,200 Berkhamsted &amp; Tring Option 1A</li> <li>• 850 Bovingdon, Kings Langley &amp; Markyate Option 1C</li> <li>• 3,800 Total or 640 dwellings pa.</li> </ul> <p>The assumption is probably weakest in relation to Hemel Hempstead, which probably have a greater capacity to absorb housing. Taking the 2,980 figure quoted in option 1b the total contribution increases to 5,030 or 694 dwellings per annum.</p> <p>Closer engagement with local communities at the beginning of the planning process would enable a realistic assessment of the potential contribution each settlement can make.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20791

Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	Our choice would be <b>a)</b> We need to be realistic in the numbers that are achievable, however the lack of infrastructure restricts higher housing numbers within Northchurch / Berkhamsted. We understand that the current household build rate per annum in Berkhamsted is nearly twice that targeted. This has a direct effect on Northchurch.
Include files	
Number	Question 16
ID	LPIO20837
Full Name	Mr Iain Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p>I have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> </ul>

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should

	<p>be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> <li>1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20913
<b>Full Name</b>	Mr Jake Storey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I live in Berkhamsted and have witnessed the size of the small town growing in an unsustainable manner. As a result I joined SYBRA and also now BRAG. I have attached the BRAG response to your proposals</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper</li> </ul>

consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

	<ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO20968
<b>Full Name</b>	Mr & Mrs J.D Battye
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents' Action Group (BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG's responses under our names so that a complete repetition of BRAG's submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council's submission.</p> <p>Q16.BRAG</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p>

## 1 D) 476 Urban Capacity

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure



used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

#### **Berkhamsted Town Council response**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

Growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints, particularly infrastructure, as should the allocation of development. It should be recognised that

predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. Berkhamsted is already near its estimated infrastructure capacity. Such disparities within Dacorum must be taken into account when assessing development numbers and site options going forward. DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at

	<p>this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.</p> <p>Para 6.1.14 is a misleading paragraph which appears to be designed to justify a high housing target. The Government consultation does not indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to disadvantage authorities working on updating their plans, indeed the consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</p> <p>An Inspector may conclude that a local plan does not need to provide for its objectively assessed housing need if there are significant constraints. In a report dated 29 September 2017, in respect of the Adur Local Plan, the Inspector agreed that Adur District Council could not satisfactorily deliver its OAN for housing sustainably because of "the significant constraints that exist" and concluded that the Council's approach to housing was justified (PINS/Y3805/429/6 refers).</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21053
<b>Full Name</b>	julie owen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>The attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements</p>

identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

It was accepted in *King's Lynn and West Norfolk (2015) 16* on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a

	<p>year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21118
<b>Full Name</b>	Sheron Wilkie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>Please find attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage</p>

Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through *Hunston (2013) 14* and *Gallagher Estates (2014) 15*.

It was accepted in *King's Lynn and West Norfolk (2015) 16* on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.

In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

	<p>As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.</p> <p>It is the our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21162
<b>Full Name</b>	St Albans Diocesan Board of Finance
<b>Company / Organisation</b>	St Albans Diocesan Board of Finance
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>SADBF have reviewed the SHMA documents against the various targets suggested in the Plan. It is acknowledged the DBC presented a range of housing targets within the first draft of the Plan,</li> </ul>

and then updated this on the publication of the Governments Consultation on the Standard Methodology for Calculating Housing Need

- SADBFB consider that DBC should focus on their evidence-based figure of 756 homes per year, but also have regard to the likely increase in housing need that will result following adoption of the standard methodology
- SADBFB consider the inclusion of the lower range figure of 602 homes per year to be an emotive matter, used to generate support for a housing target short of meeting full housing needs. Such a decision to fall short of meeting full objectively assessed need should come only after a full review of the capacity within the borough; proceeding with a such a plan would inevitably result in the Examining Inspector finding the Plan unsound; especially where there is no evidence of discussion with neighbouring authorities to agree where the unmet need can be accommodated
- Referencing the lower figure of 602 dwellings per annum as 'the Government's draft figure' is misleading. The standard methodology applies a maximum 40% cap to any uplift in housing need generated by the standard methodology; as the Core Strategy (adopted September 2013) is currently less than 5 years old, the Core Strategy Target of 430 is used as the starting point. However, post September 2018, the Core Strategy would be more than 5 years old, and the SHMA figure would be used as the base to which the 40% cap would be applied. The lower figure of 602 is simply a quirk of the standard methodology, that would never apply. Therefore, this lower figure should be removed from further consideration
- SADBFB suggest the SHMA figure of 756 homes per year is an appropriate starting point for use in the Plan at this point. It represents a relatively up-to-date figure and one that is agreed by most neighbouring authorities (Watford, Hertsmere, Three Rivers). It is however necessary to ensure the final figure is the most up-to-date figure available
- SADBFB consider it is necessary for DBC to have in mind an increased figure of up to 1,100 homes per year as generated by the standard methodology. This does provide a clear indication of the Government's thinking to how housing need should be prioritised. SACDC are (for example) considering the figure of 913 dwellings per annum as per the standard methodology set for consultation in their Issues and Options Plan in January 2018
- In summary, SADBFB suggest 756 dwellings per annum is an appropriate initial figure. However, DBC must be aware that there will be a more than likely possibility of substantial increase to this figure and should seek to identify sites on the assumption of a housing need target above 1,000 homes per annum

**Include files**

Number	Question 16
ID	LPIO21194
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p>Together with BRAG, I have grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', we contend that the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <p>The inclusion of higher density developments in appropriate areas of Hemel is not addressed in any detail in the proposed approach. More emphasis on taller buildings in appropriate areas will reduce the pressure on Green Belt, but only if it is considered fully before the easy option of Green Belt release</p> <p>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are <b>NOT</b> and do <b>NOT</b> have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc. constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions</p> <p>This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>"</p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>D) 476 Urban Capacity</b></p>



It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However, I would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release. DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are **NOT** and do **NOT** have to form the housing. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc. constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions.

This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that I have grave reservations about the methodology which calculated DBC’s ‘locally assessed need’, I contend that the constraints of the area mean that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and, as argued by BRAG in previous submissions, the decline in household numbers has not progressed at the level previously predicted and I would argue that this has not been accounted for. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity

	<p>and the suitability of the sites proposed within the recognised constraints - as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated, which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does <b>NOT</b> indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a <b>2 year grace period</b> while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years - which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. (For the sake of clarity, I am not suggesting adoption of the plan should be left the last date but simply offer it as an example.)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21247
<b>Full Name</b>	Sarah Lightfoot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be taken into account. I strongly support their submission (below)</p> <p>The NPPF explains at para 14 that Local Plans should meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and unless specific policies in the Framework indicate development should be restricted. Examples of areas where development should be restricted are listed in footnote 9 of the NPPF. They are abundant in Dacorum BC, where there are Special Areas of Conservation, many sites designated as Sites of</p>

	<p>Special Scientific Interest, significant areas of land designated as Green Belt and Area of Outstanding Natural Beauty, designated heritage assets; and locations at risk of flooding.</p> <p>The process of establishing the housing requirement should involve taking the OAN figure and assessing capacity and constraints so that the figure is, if necessary, reduced. The capacity for development in landscape and environmental terms in Dacorum should establish the appropriate number. There is no evidence in the plan that this taken place, we are just being asked to select which OAN figure we favour as the starting point. The diagram in the plan shows OAN followed by a cog for testing housing growth options, including land designations like Green Belt and AONB, land availability information, local infrastructure capacity, SA, and feedback from consultation. This testing process needs to happen and the consultation should be asking what is the appropriate level of growth, not which OAN figure to use as a starting point.</p> <p>The Chilterns Conservation Board agrees with the conclusion in the SA Working Notes that the higher the level of growth, the greater potential for adverse effects. This could include</p> <ol style="list-style-type: none"> <li>1. more water abstracted to serve development from Chilterns chalk streams (a globally rare habitat and already none in Dacorum are in good health, mainly because of low flows from over-abstraction)</li> <li>2. loss of natural beauty</li> <li>3. "nibbling" of development at the edge of the AONB</li> <li>4. increased recreation pressure on honeypot sites like Ashridge</li> <li>5. nitrogen pollution from vehicle emissions affecting plantlife, especially the habitats of the Chilterns Beechwoods Special Area of Conservation.</li> </ol> <p>The Chilterns Conservation Board has recently produced guidance in a Position Statement on Cumulative Impacts of Developments on the Chilterns AONB which should be of assistance in identifying effects and assessing them, it is available online at <a href="http://www.chilterns.gov.uk/development/positionstatements.html">http://www.chilterns.gov.uk/development/positionstatements.html</a></p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21317
<b>Full Name</b>	Antony Harbidge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).

**Your response - Please add your response here**

Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.

Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.

**BRAG response to Question 16 (please note full document is attached to Q46)**

**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**1 D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG

has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21363
<b>Full Name</b>	Helen Kington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to</i> </li></ul>

*determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21404
<b>Full Name</b>	James Good

Company / Organisation	Angle Property Limited
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	b) The figure of 756 homes a year
Your response - Please add your response here	<p><i>Question 16: Which figure of housing need do you think is the most reasonable to use as the starting point when setting out housing target? [Answer is b)]</i></p> <ol style="list-style-type: none"> <li>1 <b>The Government's draft figure of 602 homes a year</b></li> <li>2 <b>The figure of 756 homes a year</b> <ol style="list-style-type: none"> <li>1 <b>The figure of 1,000 to 1,100 homes a year from the Government's draft standard formulas; or</b></li> <li>2 <b>Another figure (please specify)</b></li> </ol> </li> </ol> <p>Details:</p> <p>Having reviewed the options with regard to the figure for future housing need, APL considers that (b), the figure of 756 homes a year, should be utilised.</p> <p>The Government's figures are, at this stage, in draft and may change before they are finalised. Figure b) represents a level that has been defined by the Local Authority following extensive research at a local level, and is therefore more likely to be a robust figure of actual housing need</p> <p>However, it is noted that if the Government's methodology were to be confirmed, then after September 2018 the Council would need to meet the higher figure (c) level. Given the timescales for plan making the plan is unlikely to have progressed sufficiently by September 2018 to make the Figure 1 level realistic. Therefore, in endorsing the Figure (b) level of 756 dwellings per annum APL considers that this should be a minimum level and that the figures should be reviewed in light when the Government methodology is finalised.</p>
Include files	
Number	Question 16
ID	LP1021422
Full Name	Mr R Smith and Mr A Lyell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	b) The figure of 756 homes a year
Your response - Please add your response here	1.17.1 The Landowners have reviewed the SHMA documents against the various targets suggested in The Plan. It is acknowledged the DBC presented a range of



housing targets within the first draft of The Plan, and then updated this on the publication of the Governments Consultation on the Standard Methodology for Calculating Housing need

1.17.2 The Landowners consider that DBC should focus on their evidence base figure of 756 homes per year, but also have regard to the likely increase in housing need that will likely come forward following adoption of the standard methodology

1.17.3 The Landowners consider the inclusion of the lower range figure of 602 homes per year to be an emotive matter, used to generate support for a housing target short of meeting full housing needs. Such a decision to fall short of meeting full objectively assessed need should come only after a full review of the capacity within the borough; proceeding with a such a plan would inevitably result in the Examining Inspector finding The Plan unsound; especially where there is no evidence of discussion with neighbouring authorities to agree where the unmet need can be accommodated.

1.17.4 Referencing the lower figure of 602 dwellings per annum as 'the Government's draft figure' is misleading, the standard methodology, applies a maximum 40% cap to any uplift in housing need generated by the standard methodology; as the Core Strategy (adopted September 2013) is currently less than 5 years old, the Core Strategy Target of 430 is used as the starting point; however, post September 2018, the Core Strategy would be more than 5 years old, and the SHMA figure would be used as the base to which the 40% cap would be applied. The lower figure of 602 is simply a quirk of the standard methodology, that would never apply; therefore, this lower figure should be removed from further consideration

1.17.5 The Landowners suggest the SHMA figure of 756 homes per year is an appropriate starting point for use in The Plan at this point. It represents a relatively up to date figure and one that is agreed by most neighbouring authorities (Watford, Hertsmere, Three Rivers). It is however necessary to ensure the final figure is the most up to date figure available

1.17.6 The Landowners consider it is necessary for DBC to have in mind the increased figure of up to 1,100 homes per year as generated by the standard methodology. This does provide a clear indication of the Governments thinking to how housing need should be prioritised. SACDC are for example considering the figure of 913 dwellings per annum as per the standard methodology set for consultation in their Issues and Options Plan in January 2018

1.17.7 In summary, The Landowners suggest 756 dwellings per annum is an appropriate initial figure, however DBC must be aware, that there will be a more than likely chance of substantial increase to this figure and should seek to identify sites on the assumption of a housing need target above 1,000 homes per annum

**Include files**

**Number**

Question 16

<b>ID</b>	LPIO21493
<b>Full Name</b>	Hightown Housing Association
<b>Company / Organisation</b>	Hightown Housing Association
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<b>Question 16 Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? Answer = c)</b>  The rationale behind the Government's figure c) 1,000-1,100 homes is supported in the context of an aging plan.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21512
<b>Full Name</b>	Mr Chris Briggs
<b>Company / Organisation</b>	St Albans City & District Council
<b>Position</b>	Spatial Planning Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<b>Q.16 Housing need figure – d)</b> <b>4. Housing need</b> (Sections 6 / 10).  It is appreciated that publication of the Government's consultation draft standard housing need methodology came at a similar time to the consultation going live and that it is only a consultation. However DBC's initial analysis of the level of housing need and implications for Plan targets does not appear to be sufficiently robust. This is because, though there is mention of, (and an option for meeting), the likely higher levels of need suggested by the Government methodology (1,056 per annum by our calculation), there is no acknowledgement that the proposed lower 'adopted plan cap' figure of 602 per annum would not apply in the case of DBC because the Plan could not be submitted within the 'by March 2018' timescale.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21543
<b>Full Name</b>	Mrs Valerie Silverton
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>I have read the proposals and strongly agree BRAG's responses.</p> <p><b>BRAG response to Question 16 (please note full document is attached to Q46)</b></p> <p><b>Question 16</b> Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p><b>1 D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity</li> <li>• The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" Notwithstanding the fact that BRAG has grave reservations about the methodology in</li> </ul>

the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.
- 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21600
<b>Full Name</b>	Mr Charlie and Claire Laing
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>A)Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process (SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.</p> <p>This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to <i>King's Lynn and West Norfolk</i></p>

(2015) that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published “*Planning for the right homes in the right places*” which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum’s limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgefield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council’s Site Allocation Local Plan of 6th April 2017.

*14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678*

*15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283*

*16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464*

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21645
<b>Full Name</b>	Silversaw Ltd
<b>Company / Organisation</b>	Silversaw Ltd
<b>Position</b>	
<b>Agent Name</b>	Mark Novelle
<b>Company / Organisation</b>	CBRE
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p>There is a significant housing crisis in England. The Government, through their recent consultation document, has expressed their commitment to significantly increase new house building in order to meet the housing need in the UK.</p> <p>It is our view that DBC should plan for a significant level of growth within the Borough, and although the Government's new methodology is not yet adopted it would be reasonable for DBC to use the figure of 1,000 to 1,100 homes a year. Whilst we do understand that this figure is significantly higher than in the current Core Strategy, this is a reflection of the increasing housing pressure within the Borough.</p> <p>During the Examination of the Core Strategy the Inspector raised concerns with regards to the housing trajectory and the shortfall in the delivery of housing. The Inspector found that there was a divergence between the CLG dwelling projection and the proposed target put forward by DBC. Whilst not an overwhelming difference, the Inspector considered that there was insufficient evidence to enable the him to conclude that the shortfall could be accommodated. Therefore, the Inspector required that DBC commit to an early review of their Core Strategy to ensure that the housing trajectory and delivery rates aligned. Given this pre-existing context we consider that this is further supporting our view that DBC should plan for the future by accommodating the higher figure of housing need and identifying the land for housing delivery in the plan.</p> <p>Further to this, the neighbouring boroughs within the Housing Market Area (HMA), with whom DBC have a duty to co-operate, are under similar if not greater pressures and DBC may be required to assist with the meeting of un-met housing needs from adjacent boroughs.</p> <p>Whilst we acknowledge that the Government methodology is in draft and should DBC submit for examination by September 2018 the methodology is not applicable, given wider influences DBC should incorporate the highest growth option, otherwise the development of their Local Plan could be hindered, specifically relating to plan adoption and the long-term growth strategy, as any delay in the plan process carries the risk of the additional homes being required.</p>

	Given this background we consider the only reasonable approach would be to factor into the new Local Plan the highest level of growth, especially at this early stage.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21662
<b>Full Name</b>	Hannah Pattinson
<b>Company / Organisation</b>	Linden Homes
<b>Position</b>	Strategic Land Regional Director
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p><b>Housing targets</b></p> <p>In the Government's consultation on <i>Planning for the Right Homes in the Right Places</i>, the standardised housing targets for Dacorum appear to show a decrease from what is in the previous SHMA i.e. from 756 to 602, however, as recognised in the Issues and Options document this figure is lower because the Core Strategy is currently less than 5 years old and a 40% increase on the current housing target of 430 homes a year creates a much-reduced and constrained target (602).</p> <p>Whilst it may not be popular, the Local Plan should make the difficult decision and seek to accommodate a level of need which is at least the targets identified in the SHMA and should realistically be planning for the figures that are generated by the new methodology. The Issues and Options document identifies that if the proposed formula for authorities with older plans is used, the housing figure rises to around 1,000-1,100 homes a year. This is a true reflection of need. The cap of 40% identified in the Government consultation is regarded as an arbitrary figure and the difficult decision should be taken now to accommodate the right level of need going forward as not doing so will simply increase demand and restrict supply in the future, worsening the existing problem.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21687
<b>Full Name</b>	Countryside Properties (UK) Ltd
<b>Company / Organisation</b>	C/O Bidwells
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• CPUK have reviewed the SHMA documents against the various targets suggested in The Plan. It is acknowledged the DBC presented a range of housing targets within the first draft of The Plan, and then updated this on the publication of the Governments Consultation on the Standard Methodology for Calculating Housing Need.</li> <li>• CPUK consider that DBC should focus on their evidence base figure of 756 homes per year, but also have regard to the likely increase in housing need that will likely come forward following adoption of the standard methodology.</li> <li>• CPUK consider the inclusion of the lower range figure of 602 homes per year to be an emotive matter, used to generate support for a housing target short of meeting full housing needs. Such a decision to fall short of meeting full objectively assessed need should come only after a full review of the capacity within the borough; proceeding with a such a plan would inevitably result in the Examining Inspector finding The Plan unsound; especially where there is no evidence of discussion with neighbouring authorities to agree where the unmet need can be accommodated.</li> <li>• Referencing the lower figure of 602 dwellings per annum as 'the Government's draft figure' is misleading, the standard methodology, applies a maximum 40% cap to any uplift in housing need generated by the standard methodology; as the Core Strategy (adopted September 2013) is currently less than 5 years old, the Core Strategy Target of 430 is used as the starting point; however, post September 2018, the Core Strategy would be more than 5 years old, and the SHMA figure would be used as the base to which the 40% cap would be applied. The lower figure of 602 is simply a quirk of the standard methodology, that would never apply; therefore, this lower figure should be removed from further consideration.</li> <li>• CPUK suggest the SHMA figure of 756 homes per year is an appropriate starting point for use in The Plan at this point. It represents a relatively up to date figure and one that is agreed by most neighbouring authorities (Watford, Hertsmere, Three Rivers). It is however necessary to ensure the final figure is the most up to date figure available</li> <li>• CPUK consider it is necessary for DBC to have in mind the increased figure of up to 1,100 homes per year as generated by the standard methodology. This does provide a clear indication of the Governments thinking to how housing need should be prioritised. SACDC are for example considering the figure of 913 dwellings per annum as per the standard methodology set for consultation in their Issues and Options Plan in January</li> <li>• In summary, CPUK suggest 756 dwellings per annum is an appropriate initial figure, however</li> </ul>

	DBC must be aware, that there will be a more than likely chance of substantial increase to this figure and should seek to identify sites on the assumption of a housing need target above 1,000 homes per annum.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21714
<b>Full Name</b>	Roger Saller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perceptive on what made the town attractive and what is now at risk.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised</p>

constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

#### BRAG response

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in

	<p>previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p> <ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21733
<b>Full Name</b>	Mr John Mawer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	Given the inability of economists to predict the unknown effect of Brexit on immigration or the unknown effect of other developments such as the nearby

	Oxford–Cambridge corridor, these seemingly precise numbers are somewhat meaningless.
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21744
<b>Full Name</b>	David Lang
<b>Company / Organisation</b>	Hemel Hempstead Constituency Labour Party
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>In considering the projected population growth figures, actuals were shown for 2011, and projections for 2021 and 2031. We believe it should be possible to validate the projected growth in the population with more recent figures than those for 2011, from the succeeding six years of hard data. Additionally, although limited data currently exists, some analysis is required of the impact from the planned exiting from the European Union.</p> <p>The Plan shows the overall requirement for housing across the whole area. There is, however, no detailed analysis of the need at a more local level across areas or wards. The Settlement Hierarchy defines local need based on the relative size, services and infrastructure of the different areas and communities but should also be broken down to a lower level.</p> <p>There are three different analyses for the number of new dwellings. The two more recent ones are somewhat higher than the current level, as one might expect. On your own detailed analysis this seems almost a given. However, in view of the age of your original planning document, and the Government stipulations for plans older than five years, it seems likely to be inadequate provision and it seems sensible to further examine the need before finalising the plan.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21757
<b>Full Name</b>	Elizabeth Hamilton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I have lived in my present house since 1996 and spent some of my childhood in the Borough, living in

Berkhamsted from 1965 and attending Ashlyns School from 1966 to 1973.

In my view the Consultation document fails to provide adequate justification for the growth rates proposed for the Borough. Dacorum has an up-to-date Local Plan, and although at the time of the Core Strategy EiP a review was agreed, there was and is no specific timetable for this.

Paragraph 3.3.4 is misleading. The letter written on 7th June 2016 by Brandon Lewis, then Minister of State for Housing and Planning, remains Government policy. The key parts of this letter are as follows:

‘Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries. However, we recognise that it is local authorities, working with their communities and with detailed local knowledge, which are best placed to decide the most sustainable, suitable and viable sites for new homes.’

For the avoidance of doubt I have attached a copy of this letter.

The protection of the Green Belt was restated by the Prime Minister on 15th November 2017, when it was reported in the Times that she ‘ruled out building in the Green Belt’. There was no change to Green Belt policy in the autumn 2017 Budget.

Paragraph 3.7.3 refers to various government consultations in progress but none of these has been concluded. In particular without the outcome of the consultation on the right approach to calculating housing need it is difficult to form a judgement on the housing targets in this Consultation.

Paragraph 3.3.4 is also misleading because it fails to recognise that other Local Planning Authorities in England have not planned to meet their housing needs in their Local Plans due to environmental constraints and those Plans have been found to be sound. A recent example is Adur District Council. There is no Green Belt in Adur but the Inspector found that the Council could not meet its full housing need because of the ‘significant constraints that exist’, one of which is the need to preserve the ‘local green gaps’. If this can apply to ‘local green gaps’ it applies even more powerfully to Green Belt which is accorded significantly greater protection under the NPPF. The Inspector also found that there are constraints to development within the wider Housing Market Area which includes Adur, one of which is the existence of the South Downs National Park.

Paragraph 6.1.1 is misleading as there have been no further announcements following the Housing White paper consultation.

Paragraph 6.1.2 is incorrect for the reasons set out above in my comments on Paragraph 3.3.4 citing the example of Adur District Council.

Paragraph 6.1.14 refers to the recent consultation on calculating housing need but there have been no further announcements since the consultation. Some of the

	<p>proposals in the consultation were widely criticised, as is acknowledged in paragraph 6.1.15.</p> <p>Question 16 asks which housing figure is most reasonable to use. My view is that the Core Strategy figure is reasonable. Even that figure will result in loss of over 80 hectares of Green Belt in the Local Allocations, which I do not agree with for the reasons already set out above relating to Green Belt. In my view the starting premise should be that the Green Belt will be protected with no further losses, in accordance with national policy.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21826
<b>Full Name</b>	W Lamb Ltd
<b>Company / Organisation</b>	W Lamb Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>It is considered that the most reasonable figure of housing need should be (d) 'Another figure', for the reasons discussed below.</li> <li>Paragraph 47 of the NPPF requires local authorities to, inter alia "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period".</li> <li>Each of the options under Question 16 is based on a different input to determine the Council's level of housing need.</li> <li>Options (a) and (c) are based on figures from a draft Government consultation document, 'Planning for the right homes in the right places'. This consultation ended on 9 November 2017 and the Government is still in the process of reviewing the consultation responses received in relation to the proposed standard approach to calculating housing need, amongst the other draft proposals, which has been subject to criticism by many local authorities and professional bodies.</li> <li>This includes the Home Builders Federation (HBF), whose members deliver around 80% of new homes built each year. In its consultation response (enclosed in full at <b>Appendix 4</b>), the HBF raises a number of concerns about the proposed standard approach for assessing local housing need, including <i>inter alia</i>:</li> </ul>

- Housing provision within local plans should be clearly stated as minimum levels rather than a ceiling on housing delivery. There is no justification for figures derived from the standard methodology to be capped, particularly since the cap is proposed to apply solely to increases in housing numbers rather than decreases;
- Measuring household growth over a ten year period is a very blunt approach to planning for future growth. It means that areas of previously planned growth will continue to have high housing requirement figures while those areas that have previously been areas of restraint will continue to perpetuate this position since their household projections will be suppressed by previous planned low growth and low delivery over the last 10 years;
- There appears to be no rationale behind the Government's proposed formula for the proposed affordability adjustment factor;
- The assessment of housing need should only be the starting point for Local Authorities. If the proposed methodology for calculating housing need is not to be translated directly into local plan housing requirements then it should be made clear what adjustments and assessment should be taken account of in coming to that figure in a local plan; and
- The standard methodology makes no reference to how economic growth aspirations or requirements should be factored in to setting a housing requirement figure in a local plan. Even the Government's national economic growth strategies (such as the Northern Powerhouse) are not reflected in the current proposed methodology.

Given the extent of uncertainty and unresolved objections to the Government's proposed standard methodology, it is not considered appropriate to justify a figure entirely based on a potential methodology.

Option (b) is based on the OAN identified in the South West Hertfordshire SHMA of Having undertaken a detailed review of the SHMA however, it is considered that the SHMA currently underestimates the OAN for Dacorum Borough.

The reasons behind this conclusion are detailed at **Appendix 5**. In summary, this identifies that affordability has worsened considerably since the SHMA was published. House prices have increased at a much greater rate than regional and national averages and the affordability ratio is now over 13 compared with a national average of around 7. The need for affordable housing in Dacorum is also extremely high and is expected to have increased further since the SHMA was published. The delivery of housing compared to need since 2013, which is the base date of the SHMA, has been relatively low and there is already an undersupply of around 1,000 dwellings which is likely to have contributed to worsening affordability.

In light of the above, it is considered that the minimum uplift based on the market signals analysis should be 10% at this stage, **taking the OAN to 800 dwellings per annum**. This is a considerable uplift compared to



	<p>the 756 dwellings per annum identified in the SHMA. <b><u>Over the period 2013 – 2036, this takes the OAN from 17,388 dwellings to a minimum of 18,400 dwellings, which equates to an additional 1,012 dwellings.</u></b></p> <p>Whilst some changes are likely to the standardised methodology, it provides some steer as to the direction of travel at a national level. Alongside this, notwithstanding the concerns highlighted about the SHMA, the methodology within SHMAs is becoming increasingly accepted by Inspector's given the number of Local Plans supported by SHMAs that have now been through the Examination process.</p> <p>As set out above, the need to <i>"boost significantly the supply of housing"</i> is clearly set out within the NPPF. This position has been re-emphasised many times since the publication of that document. Alongside this, Dacorum were originally intending on meeting their OAN as set out within their SHMA. Therefore for Dacorum to reduce the housing target in any way from their OAN would be artificially constraining the supply of housing contrary to the direction of national planning policy. Therefore, given the sites available to Dacorum and conclusions of our assessment of the SHMA, to plan for an absolute minimum of 800 homes per annum can only be the right and robust approach in progressing the Local Plan</p> <p>It must also be noted that these figures take no account of any additional requirement that may need to be met within Dacorum as part of the duty to cooperate.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21854
<b>Full Name</b>	Pennard Holdings
<b>Company / Organisation</b>	PENNARD HOLDINGS
<b>Position</b>	
<b>Agent Name</b>	Peter Atkin
<b>Company / Organisation</b>	Pegasus Group
<b>Position</b>	Principal Planner
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• The Housing White Paper (February 2017), the NPPF and the accompanying National Planning Practice Guidance (NPPG) confirms the Government's commitment to boosting housing supply</li> <li>• Assessing the development needs of DBC and identifying specific and deliverable sites in order to facilitate this is therefore a critical aspect of the Local Plan- making process</li> <li>• In reference to the proposed 'case for development' outlined above, the following section seeks to highlight the significant development</li> </ul>

needs within DBC and the associated need to bring forward suitable Green Belt sites in order to meet identified housing needs

### **Need**

- The borough's objectively assessed need has been investigated as part of the evidence base in support of the new Local Plan. As highlighted above, the NPPF requires the new Local Plan to meet the full objectively assessed needs for the market area, as far as is consistent with the policies set out in the framework
- The Strategic Housing Market Assessment (SHMA, February 2016), which forms part of the evidence base of the draft Local Plan (Issues & Options), identifies an objectively assessed **housing need of 17,388 net additional dwellings between 2013-2036** (annual requirement of 756 dwellings). This compares with the adopted Core Strategy (2013) requirement of just 430 net additional dwellings per annum (dpa) between 2006 and 2031, and therefore represents a significant increase in housing need which DBC is required to meet in full as far as is consistent with the policies of the NPPF.
- Moreover, the Issues & Options consultation also identifies two further calculations of housing need in DBC following the publication of the Government's recent consultation paper on 'Planning for the right homes in the right places' (September 2017) which sets out a proposed standardised methodology for calculating housing need, which is proposed to be incorporated within a 'Revised NPPF' anticipated to be published in Spring 2018
- Under the Government's proposals, where Local Plans are less than 5 years old, as in the case with the current DBC Core Strategy (2013), then the standardized methodology calculates the Borough's housing needs to be 13,846 new homes in the period 2013-2036 (i.e. 602 dpa).
- However, the timetable for the new Local Plan anticipates adoption in Summer 2019 and accordingly, by this time the Core Strategy will be more than 5 years old. In such circumstances, the proposed standardised methodology calculates a housing need of 25,300 in the period 2013-2036 (i.e. 1,100 dpa).
- In summary and as reported within the Issues & Options consultation the potential housing targets for DBC in the period 2013-2036 comprise the following options:
  - **Option 1: Draft Government Figure: 602 dpa** (on the basis of the Government's standardised methodology, should the adopted Local Plan be in effect for no greater than five years);
  - **Option 2: Locally Assessed Need: 756 dpa** (on the basis of the SHMA); or
  - **Option 3: Draft Upper Government Figure: 1,100 dpa** (on the basis of the Government's

standardised methodology, should the adopted Local Plan be in effect for greater than five years).

- The SHMA (2016) housing need figures (Option 2) remains compliant with the current requirements of the NPPF, however whilst the standardised methodology has yet to be formally adopted, it provides a clear 'direction of travel' from central Government and it would be prudent for DBC to plan for such anticipated changes in planning policy from the outset of the new Local Plan
- DBC's timetable for adoption of the emerging Local Plan is not expected until Summer 2019 (at best). As such there is likely to be a period from September 2018 whereby the current adopted Core Strategy will have been adopted and in effect for greater than five years and the standardised methodology will also be in effect. In such circumstances, it is considered reasonable to conclude that Option 1 (i.e. the 'Draft Government figure) should be discounted as by the time the new Local Plan is adopted, it's provisions will not be consistent with national planning policy requirements and therefore as a consequence, DBC could be open to challenge.
- On this basis, and in response to **Question 16** of the Issues & Options consultation (i.e. 'Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?'), it is considered that DBC should plan to meet the housing targets expressed in 'Option 3' for 25,300 new homes (1,100 dpa) in the period 2013-2036 in the emerging Local Plan consistent with emerging national planning policy.
- In the event that the Government's proposed standardised methodology should not come into effect as anticipated, it is considered that the SHMA housing figures as presented in 'Option 2' then offers a reasonable 'fall-back' position that meets the Borough's objectively assessed housing needs of 17,388 new homes in the period 2013-2036 (756 dpa), consistent with the NPPF
- DBC should carefully consider the significant social costs/implications associated with not meeting identified/objectively assessed needs, which in particular is likely to perpetuate an increasing affordability issue for **all** sections of the community. Should DBC not meet their objectively assessed needs, then it is likely to increase pressure on the Council to find affordable homes for young people and families and accommodation for an ageing population whilst also making it harder for local businesses to find and retain employees

#### **Supply**

- The relevant supply side considerations comprise DBC's historic delivery rates and the identified supply of deliverable housing land as identified within the Council's Annual Monitoring Reports (AMR) and Strategic Housing Land Availability Assessment (SHLAA).

### Historic Delivery Rates

- In considering the deliverability of identified land supply, it is appropriate to consider historic delivery trends
- The following highlights the latest position on DBC's historic delivery rates. The findings are summarised in Table 2 below, which indicate towards a trend of over- delivery of new housing in DBC when assessed against adopted Core Strategy (2013) requirements (430 dwellings per annum).

**Table 2: DBC Historic Delivery Rates against Adopted Core Strategy (2013) Housing Targets**

<b>Year</b>	<b>Net Housing Completions</b>	<b>Annual Requirement</b>	<b>Total Shortfall / Surplus</b>
06-07	400	430	-30
07-08	384	430	-46
08-09	418	430	-12
09-10	237	430	-193
10-11	603	430	+173
11-12	447	430	+17
12-13	290	430	-140
<b>(Interim) Total 2006 – 2013</b>	<b>2,779</b>		

3,010

-231

13-14

219

430

-211

14-15

379

430

-51

15-16

659

430

+229

16-17

723

430

+293

**Total Ten Year Completions (06-17)**

**4,759**

**4730**

-

**Actual Annual Rate Achieved (4,759/11)**

**433**

-

**+29**

*Source: DBC 2015/16 Annual Monitoring Report (January 2017) Technical Appendices - Table 7.1 and DBC Residential Land Commitments Position Statement no. 44 (1st April 2017)*

- The above identifies a total surplus in delivery of +29 dwellings (average 433 dwellings per annum) in the years 2006/07 – 2016/17 against adopted Core Strategy targets (430 dwellings per annum). However, the new Local Plan seeks to plan for development between 2013-2036. Accordingly, in the period 2006- 2013, Table 2 above identifies a supply of 2,779 dwellings against a target for that period of 3,010 dwellings and therefore indicates a shortfall of -231 dwellings in this period
- The draft Local Plan identifies three potential levels of housing between 2013- 2036.
- As set out above, 'Option 1' using the lower Government figure of 602 dpa has been reasonably discounted as an appropriate calculation of housing need in DBC and as such is not considered further
- On the basis of 'Option 2' using the locally assessed housing need from the SHMA (756 dpa),

Table 3 identifies a shortfall in total housing delivery of -1,044 in the four years of the new plan period between 2013/14 – 2016/17. This combined with the shortfall against adopted requirements in the period 2006/07 – 2012/13 of -231 dwellings, indicates a total shortfall of -1,275 dwellings against adopted and emerging housing targets.

**Table 3: Historic Delivery Rates against ‘Option 2’ Housing Targets**

<b>Year</b>	<b>Net Housing Completions</b>	<b>Annual Requirement ‘Option 2’</b>	<b>Total Shortfall / Surplus</b>
06-07	400	430	-30
07-08	384	430	-46
08-09	418	430	-12
09-10	237	430	-193
10-11	603	430	+173
11-12	447	430	+17
12-13	290	430	-140
<b>(Interim) Total 2006 – 2013</b>			
	<b>2,779</b>	<b>3,010</b>	<b>-231</b>
13-14			

219  
 756  
 -537  
 14-15  
 379  
 756  
 -377  
 15-16  
 659  
 756  
 -97  
 16-17  
 723  
 756  
 -33

**Interim Total Completions (2013-2017)**

**1,980**  
**3,024**  
**-1,044**

**Total (2006 – 2017)**

**4,759**  
**6,034**  
**-1,275**

On the basis of 'Option 3' using the Government's upper figure from the proposed standardised methodology (approx. 1,100 dwellings per annum), Table 4 below identifies a shortfall in total housing delivery of -2,420 in the four years 2013/14 – 2016/17. When combined with the shortfall against adopted requirements in the period 2006/07 – 2012/13 of -231 dwellings, indicates a total shortfall of -2,651 dwellings against adopted and emerging housing targets.

**Table 4: Historic Delivery Rates against 'Option 3' Housing Targets**

<b>Year</b>	<b>Net Housing Completions</b>	<b>Annual Requirement 'Option 2'</b>	<b>Total Shortfall / Surplus</b>
06-07	400	430	-30
07-08	384	430	

-46
08-09
418
430
-12
09-10
237
430
-193
10-11
603
430
+173
11-12
447
430
+17
12-13
290
430
-140
<b>(Interim) Total 2006 – 2013</b>
<b>2,779</b>
<b>3,010</b>
<b>-231</b>
13-14
219
1,100
-881
14-15
379
1,100
-721
15-16
659
1,100
-441
16-17
723
1,100
-377
<b>Interim Total Completions (2013-</b>
<b>2017)</b>
<b>1,980</b>
<b>4,400</b>
<b>-2,420</b>
<b>Total (2006 –</b>



2017)

4,759

7,410

-2,651

In summary, the scale of the housing shortfall is significant. Whilst DBC is able to demonstrate a marginal surplus against adopted targets, when the emerging targets of the new Local Plan are factored in, it is clear that a significant shortfall in housing supply exists and the scale of the housing challenge can be fully appreciated.

- Notwithstanding this, it is noted that there has been variance between individual years in housing delivery, with 2015/16 and 2016/17 in particular providing substantially more than required by the adopted Core Strategy (2013) and therefore any under-delivery (against adopted targets) has arguably not been 'persistent'. Accordingly, in line with NPPF provisions it is appropriate to apply a 5% buffer to any housing supply calculations as DBC appears to be able to demonstrate that it does not have a persistent record of under-delivery.

#### Housing Supply

- The NPPF requires (paragraphs 159 and 161) that LPA's produce a land assessment which enables realistic assumptions about the availability, suitability and achievability of land to meet identified development needs for the duration of the plan period. The Strategic Housing Land Availability Assessment (SHLAA) 2015 (April 2016) forms part of the Council's core evidence base in support of the new Local Plan which helps identify deliverable land for development against the assessment criteria set out in the NPPF and estimates that there is capacity for approximately 14,500 new homes in the Borough. However, the bulk of these are on sites where housing is not acceptable in terms of the Council's existing planning policies, being located on greenfield sites on the edge of towns and villages, or in the wider countryside.
- Accordingly, when taking account of existing policy constraints, such as Green Belt, together with additional windfall allowances, the potential reuse of vacant properties and the Two Waters Masterplan for Hemel Hempstead, the Issues & Options consultation estimates the Borough's urban housing capacity to be approx. 10,940 homes
- Of this total housing capacity, DBC's 'Annual Monitoring Report 2015/2016 (January 2017) provides the most up-to-date record of deliverable supply within the Borough over the next 5 years as highlighted in Table 5 below:

#### **Table 5: DBC Annual Monitoring Report 5-Year Supply Projections**

#### **Plans Years**

### DBC Projected Completions

2017/18

818

2018/19

584

2019/20

1,056

2020/21

790

2021/22

590

### Total 5-Year Supply

**3,838**

*Source: DBC Annual Monitoring Report (January Table 2 – 15 Year Core Strategy Housing Trajectory data 2016/17 – 2030/31)*

- The need, or not, for Green Belt sites to contribute to the Council's 'deliverable' housing supply is considered below

### DBC 5-Year Housing Land Supply Position

- The below provides a detailed position on deliverable short-term land supply using the most recent published data (as summarised above). The below therefore sets out DBC's 5-year housing land supply position against the emerging targets established in the Issues & options consultation.
- As highlighted above, it appears to be appropriate to apply a 5% buffer in this instance as required by the NPPF, as opposed to a 20% buffer, as whilst DBC has not delivered the required level of homes across the plan period to date, there is variation year to year and therefore DBC does not appear to have a record of persistent under delivery. Although this situation should be monitored moving forward.
- Drawing the above together, Table 6 below sets out DBC's 5-year housing land supply position as at 1st April 2017 (based on the most up-to-date published information) on the basis of the housing requirements of 'Option 3', the Upper Government figure, considered to be the most appropriate calculation of future housing needs in the Borough:

**Table 6: DBC 5-Year Housing Land Supply as at 1st April 2017 (based on Option 3: Upper Government Figure of Housing Need)**

**Ref**

**Step**

**Calculation**

**Figures**

A

Local Plan Requirement (2013-2036)

-

25,300

B	Annual Requirement	
A / 23 year plan period		1,100
C	Requirement to date	
B x 4 (completed plan years)		4,400
D	Completions (2013-2017)	
		-
		1,980
E	Identified Surplus / Shortfall against adopted targets (2006-2013)	
		-
		-231
F	Overall Surplus / Shortfall (2006-2017)	
C – D + E		-2,651
G	Base requirements over next 5 years (2017-2022)	
B x 5		5,500
H	Base requirement over next 5 years + 5% NPPF allowance	
G + 5%		5,775
I	5-Year Requirement + 5% + shortfall	
H + F		8,426
J	Revised annual requirement over next 5 years	
I / 5		1,685
K	Deliverable supply over next 5 years (2017-2022)*	
		-
		3,838
L	Surplus / Shortfall	
I - K		-4,588
M		

Total Years supply over next 5 years

K / J

**2.3 years**

*\*Projected completions and projected supply as reported Table 7.2 of DBC Annual Monitoring Report 2015/16 (published January 2017)*

- Table 7 below sets out DBC's 5-year housing land supply position as at 1st April 2017 (based on the most up-to-date published information) on the basis of the 'fall-back' housing requirements of 'Option 2', the locally assessed need:

**Table 7: DBC 5-Year Housing Land Supply as at 1st April 2017 (based on Option 2: SHMA (2016) Assessment of Housing Need)**

**Ref**

**Step**

**Calculation**

**Figures**

A

Local Plan requirement (2013-2036)

-

17,388

B

Annual requirement

A / 23 year plan period

756

C

Requirement to date

B x 4 (completed plan years)

3,024

D

Completions (1st April 2013 – 31st March 2017)

-

1,980

E

Identified Surplus / Shortfall against adopted targets (2006-2013)

-

-231

F

Overall Surplus/Shortfall (2006-2017)

C – D + E

-1,275

G

Base requirement over next 5 years

B x 5

3,780

H

Base requirement over next 5 years + 5%

G + 5%
3,969
I
5-Year requirement + 5% + shortfall + 5% of shortfall
H + F
5,244
J
Revised annual requirement over next 5 years
I / 5
1,049
K
Projected supply over next 5 years* (2017/18 - 2021/22)
-
3,838*
L
Surplus/Shortfall
I - K
-1,406
M
Total years supply over next 5 years
K / J

**3.7 years**

*\*Projected completions and projected supply as reported Table 7.2 of DBC Annual Monitoring Report 2015/16 (published January 2017)*

- The above tables indicate that DBC has an equivalent 5-year housing land supply position of 2.3 years against the emerging Local Plan requirements of Option 3, including a 5% buffer as required by the NPPF. In respect of the 'fall-back' position based on the requirements of Option 2, it indicates that DBC has an equivalent 5-year housing land supply position of 3.7 years, including a 5% buffer as required by the NPPF
- Accordingly, the findings presented in Tables 6 and 7 are considered to represent the best-case scenario against emerging targets and as such it is appropriate for the Council to consider releasing suitable Green Belt sites in the early part of the new Local Plan to contribute towards the borough's identified and urgent housing land supply shortfall.

**Conclusions – Implications for the New Local Plan**

- The new Local Plan should identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's housing needs as proposed under 'Option 3' (i.e. 25,300 net additional homes in the period 2013-2036) in line with the Government's proposed standardised methodology for calculating housing need and anticipated changes to national planning policy;
- In the event that the Government's proposed standardised methodology should not come into

	<p>effect as anticipated, the new Local Plan should as a 'fall- back' position, identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's objectively assessed housing needs as proposed under 'Option 2' (i.e. 17,338 net additional homes in the period 2013-2036) as far as consistent with the NPPF</p> <ul style="list-style-type: none"> <li>• Insufficient non-Green Belt sites exist to meet housing needs in full and therefore it is appropriate to identify additional deliverable and sustainable Green Belt sites to contribute towards identified housing need;</li> <li>• DBC is unable to demonstrate a 5-year housing land supply as required by the NPPF and accordingly, the new Local Plan should identify an additional supply of land from suitable and sustainable Green Belt sites to come forward in the early part of the plan period, in order to deliver the Council's sustainable development objectives;</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21883
<b>Full Name</b>	Louis Quail
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>Please see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the augment for building on greenbelt land should only be one of last resort , there are plenty of other options left before launching off this one way route .</p> <p>Berkhamsted Residents Action Group response:</p> <ul style="list-style-type: none"> <li>• It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper</li> </ul>

consideration of increased density including taller buildings in appropriate areas would release more capacity.

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

	<ul style="list-style-type: none"> <li>• DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</li> <li>• 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21951
<b>Full Name</b>	Thomas and Margaret Ritchie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>I have not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council's response:</p> <p>Growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints, particularly infrastructure, as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <p>The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. Berkhamsted is already near its estimated infrastructure capacity. Such disparities within Dacorum must be taken into account</p>



	<p>when assessing development numbers and site options going forward. DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.</p> <p>Para 6.1.14 is a misleading paragraph which appears to be designed to justify a high housing target. The Government consultation does not indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to disadvantage authorities working on updating their plans, indeed the consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</p> <p>An Inspector may conclude that a local plan does not need to provide for its objectively assessed housing need if there are significant constraints. In a report dated 29 September 2017, in respect of the Adur Local Plan, the Inspector agreed that Adur District Council could not satisfactorily deliver its OAN for housing sustainably because of "the significant constraints that exist" and concluded that the Council's approach to housing was justified (PINS/Y3805/429/6 refers).</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO21981
<b>Full Name</b>	Waterside Way
<b>Company / Organisation</b>	Waterside Way Sustainable Planning Ltd
<b>Position</b>	
<b>Agent Name</b>	Mr Stephen Harris
<b>Company / Organisation</b>	Emery Planning Partnership
<b>Position</b>	Senior Consultant
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<p>This section assesses the housing requirement and specifically:</p> <ul style="list-style-type: none"> <li>• Issue 8 – How many new homes need to be provided by 2036?</li> <li>• Issue 25 - What levels of housing growth should we consider?</li> </ul> <p>Three housing requirement options are set out, these being:</p> <ul style="list-style-type: none"> <li>• Option 1: Draft Government figure. This would equate to 602 homes a year or 13,846 over the 2013-36 plan-period</li> </ul>

	<ul style="list-style-type: none"> <li>Option 2: Locally assessed This would currently equate to about 756 homes a year or 17,388 over the 2013-36 plan-period.</li> <li>Option 3: Upper Government This would equate to about 1,100 homes a year or 25,300 over the 2013-36 plan-period.</li> </ul> <p>Question 33 asks “Do you agree that the three growth levels proposed are the most reasonable to consider?”</p> <p>Paragraph 10.1.8 provides a commentary from the Council’s perspective on each option. Our position is that Option 2 is the most appropriate of the 3 options as that is based on the South West Hertfordshire Strategic Housing Market Assessment (SHMA). Clearly over the next 12 months the Government will publish a new NPPF and methodology for calculating housing need. Therefore the issue of housing need may well be superseded going forward but for the purposes of plan making the conclusion to draw at this early stage is that Option 2 is the minimum requirement that should be advanced.</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22012
<b>Full Name</b>	Millbank Land
<b>Company / Organisation</b>	Millbank Land
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p>The Government published ‘Planning for the right homes in the right places: consultation proposals’ in September 2017. The consultation document sets out a proposed approach to a standard method for calculating local housing need. The document was supported by an indicative assessment of housing need based on the proposed formula. The proposed methodology results in housing need of 602 dwellings per annum in Dacorum for the period 2016-2026. This is calculated by applying a 40% uplift to the Borough’s current housing target of 430 dwellings per annum as the Core Strategy was adopted in the last five years. This is not considered the most reasonable figure of housing need to use as the starting point for setting a housing target for the Borough for a number of reasons:</p> <p>First, this level of housing growth does not fully meet local housing needs in the Borough as it is capped at a level related to the currently adopted Core Strategy, which in the first instance failed to fully meet housing needs (which has in part prompted this early review). Secondly, this is based on a draft figure and the standardised methodology could be subject to change when finalised in the coming months. Thirdly, based on the emerging standardised methodology, this housing figure would only apply if the plan is published or adopted</p>

by September 2018 (after which point the current Core Strategy would have been adopted for more than the last five years). The Council's current timescale for submission is Autumn 2018 with adoption in Summer 2019. Recent research (ref 5 below) has shown that the average time from submission to a plan being found sound is 16.8 months. This suggests that the timetable is relatively optimistic and the housing need figure would be significantly outdated by the time at which the plan would be adopted.

*(5 Planned and deliver, Local Plan-making under the NPPF: A five-year progress report, Lichfields, April 2017)*

The most recent South West Hertfordshire Strategic Housing Market Assessment (SHMA) concluded on a housing need figure of 756 dwellings per annum for Dacorum. This figure included 728 dwellings per annum based on household projections with an uplift of 28 dwellings per annum to take account of market signals and could be considered to be a more accurate reflection of housing need in Dacorum. Nevertheless, the SHMA was based on the 2012 based household projections which are now outdated, and projected a lower number of household in the Borough by 2036 than the later 2014 based projections which were published in July 2016. The household projections are updated every two years and therefore will be revised again in Summer 2018, prior to the publication of the emerging Local Plan. On this basis, a Local Plan based on the figure of 756 dwellings per annum would not be considered as robust.

In the event that the plan is not published or adopted prior to September 2018, the Government's proposed approach to a standard method for calculating local housing need would suggest that the new annual local housing need figure would be capped at 40% above either the annual requirement figure currently set out in their local plan (430 dwellings per annum) or the projected household growth for their area – whichever is higher. The Council has estimated that this will increase the housing requirement to around 1,000-1,100 dwellings per annum which is an 'uncapped' figure. It would appear that this figure has been calculated based on a 40% uplift being applied to the level of housing derived from the latest SHMA.

As outlined above, this calculation of need is not based on the most up-to-date data available and as a result would be contrary to paragraph 158 of the NPPF. The Government's consultation document states that: "*local planning authorities, when calculating their local housing need, should always use the most up-to-date data available*". This means that the local housing figure will not remain static throughout the plan preparation process. The Government has proposed "*that local planning authorities should be able to rely on the evidence used to justify their local housing need for a period of two years from the date on which they submit their plan*". Therefore, the Council should ensure that the figure used up to the point of submission, should be based on the most recent data available.

Notwithstanding, this figure is considered to be the most appropriate of the options outlined.

It is worth highlighting however, that none of the figures of housing need put forward by the Council within the Issues and Options document take account of unmet needs from elsewhere in the South West Hertfordshire Housing Market Area (HMA) or from other nearby areas or London. As a whole, the HMA, which includes Dacorum, Hertsmere, St Albans, Three River and Watford, is faced with significant constraints to development and a number of the local planning authorities are likely to have difficulty in meeting their needs within their boundaries. The Council has set out that none of authorities in the HMA have indicated that they require Dacorum to accommodate any significant levels of unmet needs for their areas, however, Welwyn Hatfield have asked Dacorum to consider taking some of its unmet needs.

The Local Plan review is intended to assess the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum. The Government consultation places a renewed emphasis on ensuring that effective co-operation is happening and that local planning authorities are planning for wider housing needs, including unmet needs, by requiring the preparation of Statements of Common Ground (SoCG). The SoCG should include the process for agreeing the distribution of housing need (including unmet need) across the wider area, and agreed distributions. The test of soundness is to include that plans should be prepared based on a strategy informed by agreements over the wider area. While Dacorum is relatively constrained in its own right, it is unlikely that any of the other authorities in the HMA will be in a position to meet any of the Borough's unmet needs and therefore the Council through the emerging Local Plan should seek to, at least, meet the full extent of their needs. The Council should also be actively engaging with other authorities to inform the forthcoming planning strategy to ensure the Local Plan is robust.

On this basis and taking account of the factors set out above, the figure of housing need that the Borough uses as the starting point for setting the housing target should be based on the most up-to- date evidence and should fully reflect local levels of need in full as a minimum. This will require the identification of some greenfield land across the Borough given the lack of supply of sufficient brownfield alternatives.

<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22031
<b>Full Name</b>	Gallagher Estates
<b>Company / Organisation</b>	Gallagher Estates
<b>Position</b>	
<b>Agent Name</b>	Mrs Hanna Staton
<b>Company / Organisation</b>	Pegasus Group

<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• The accompanying Housing Evidence Base Paper (Appendix A) considers each of the options proposed in detail. A summary of the paper is set out below.</li> <li>• Taking the mid figure identified from the SHMA process first, that whilst the approach taken in the SHMA is generally supported it is important to note that some of the data used to identify the dwelling requirements (such as the household projections) has since been superseded by more up to date data. This is acknowledged by the Council. It is known that for Dacorum, the latest data in household projections (2014 based) identifies a greater number of additional households projected over the same period of 2013 to 2036. The figure of 756 dwellings per annum is potentially too low. Further, with regard to market signals, a mere 3% uplift has been applied despite there being evidence that affordability is a significant local issue. As discussed further below, the Government has used affordability as a key indicator in determining appropriate dwelling requirements nationally. The uplift has been capped at 40% for Dacorum Borough. Accordingly, a mere 3% is a very disappointing, particularly if there is to be a significant boost in housing delivery. There is a further concern relating to the affordable housing need identified in the SHMA. The net annual need is 366 affordable homes per annum. In order to deliver this level of affordable homes through private market homes, on the basis of the existing affordable housing policy requirement of 35%, a total of 1,046 market homes would need to be sought. Clearly, the SHMA dwelling requirement of 756 dwellings per annum is insufficient to meet both market and affordable needs in this respect. It is claimed that the private rented sector will have a role to play in providing for affordable housing need, however, there is concern that there is little certainty for householders in this position with regard to a number of factors, including rent levels and length of contract term. Such a view has been supported by a number of Planning Inspectors. To conclude on the figure 756 dwellings per annum, there is concern that based on the evidence presented the level of homes is not quite sufficient. If the NPPF remains as currently prepared, it is recommended that the SHMA is updated to rectify and reconsider the above matters.</li> <li>• In terms of the other figures proposed, the 602 dwellings per annum figure has been identified as the indicative level of need from the Standard Methodology based on the Core Strategy dwelling requirement as the baseline figure with an affordability uplift capped at 40% of the dwelling requirement on the basis that it is less than five years old. In preparing the new Local Plan, it would</li> </ul>

	<p>be illogical to plan for this level of growth as it less than what the raw household projections data suggests for Dacorum (749) and unmet need would arise as a result, which could lead to even higher house prices, local people migrating elsewhere to more affordable locations etc, and have a detrimental impact on the economy</p> <ul style="list-style-type: none"> <li>• Alternatively and particularly considering that the Core Strategy will exceed five years of age in September 2018, it will be appropriate to consider the indicative level of need from the Standard Methodology based on the household projection as the baseline figure with an affordability uplift capped at 40% of the household projection. Based on this method, a dwelling requirement of 1,085 would be applicable for Dacorum. Whilst this figure is significantly higher than previous growth levels and is a challenging prospect to deliver, this level of homes will address those issues raised in respect of the SHMA figure: addressing affordability in the Borough and delivering more affordable homes. In light of this, it is considered that the highest figure of 1,085 dwellings per annum could provide a more sound basis to plan for. It is acknowledged, however, that these figures presented from the Standard Methodology are of limited weight as they were identified as part of a consultation document. It does demonstrate the direction of travel for the Government and it is anticipated that a revised NPPF will be published in the Spring of 2018, which will clarify how dwelling requirements should be identified.</li> <li>• In terms of the land needed to meet the preferred dwelling requirement, it has been identified that there is limited capacity and the Council has helpfully undertaken a Green Belt review to identify which if any Green Belt land could be removed as it performs less well against the five purposes. It is unknown, however, if the review has identified sufficient sites to meet the higher dwelling requirement or whether the review needs to be revisited to examine if further capacity can be identified.</li> <li>• In terms of the Gorhambury land, whilst this may serve the needs of Hemel Hempstead if St Alban's do not agree that homes in this location should be counted towards the Dacorum dwelling requirement, it cannot be deducted from the Dacorum overall dwelling requirement. There is a concern that otherwise double counting would occur and there would be a shortage of 2,500 homes in the HMA. It is important that there is agreement of the level of need in the HMA and the distribution between the authorities if there is to be cross boundary sharing of need.</li> </ul>
<b>Include files</b>	<a href="#">Appendix A - Stuart Wells Gallagher Estates -office BIR.4712_IssuesandOptionsReps_FINAL_131217 APPENDIX A.pdf</a>
<b>Number</b>	Question 16
<b>ID</b>	LPIO22100

<b>Full Name</b>	Crest Nicholson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Sarah Moorhouse
<b>Company / Organisation</b>	Lichfields
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	Section 2.0 of the Land at Blegberry Gardens, Berkhamsted (Site Be-h6) - Representations to Dacorum's New Local Plan: Issues and Options (Nov 2017) document by Lichfields on behalf of Crest Nicholson Chiltern sets out our detailed analysis of this matter and our conclusions that Options A and B would not underpin a "sound" Local Plan whilst Option C or a slightly higher figure (Option D) would reflect both the available housing need data and the Government's stated objective to increase housing delivery to 300,000 dpa.
<b>Include files</b>	<a href="#">Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Reprs (13.12.17).PDF</a>
<b>Number</b>	Question 16
<b>ID</b>	LPIO22131
<b>Full Name</b>	Mrs Hayley Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22175
<b>Full Name</b>	Mr Peter Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	

<b>Number</b>	Question 16
<b>ID</b>	LPIO22219
<b>Full Name</b>	Miss Sophie Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22447
<b>Full Name</b>	Ashleigh Michnowiec
<b>Company / Organisation</b>	Harrow Estates plc
<b>Position</b>	
<b>Agent Name</b>	Mrs Sam Ryan
<b>Company / Organisation</b>	Turley Estates
<b>Position</b>	Director
<b>Housing numbers - Please provide your chosen option</b>	c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula
<b>Your response - Please add your response here</b>	<p>The report sets out the case, on behalf of Harrow, to support the highest level of housing growth in the borough which is required to meet Dacorum's clearly identified needs. It is Harrow's view that a housing requirement figure of 25,300 (1,100dpa) for the borough, derived by applying the Government's draft standardised methodology, is justified and necessary to assist in addressing housing market signals and lack of affordability, particularly in Tring.</p> <ul style="list-style-type: none"> <li>• The Government is committed to addressing the need to build more houses of the right type in the right places. The Council has historically failed to plan for or provide the homes that are needed in Dacorum; with housing completions falling short of a trajectory which itself was found at adoption of the Core Strategy to be insufficient to meet housing needs over the long-term.</li> <li>• The evidence base for the new Local Plan indicates that at least 756 dwellings per annum are needed in Dacorum over the plan period (2013 – 2036). Under the Government's proposals for a new standardised method for calculating housing needs there is a requirement to deliver between 602 (capped) and 1,100 (uncapped) dwellings per annum. All three options indicate a need for significantly more homes than the Council currently plans for (430dpa) or has delivered on average in</li> </ul>



recent years (386dpa delivered on average between 2001 – 2016).

- The report concludes that Option 3 (1,100dpa) represents the most appropriate basis for progressing the emerging Local Plan by identifying housing land and its distribution. The calculated level of need will need to be updated to take account of the Government's proposed standard method in its final form – which is anticipated in early 2018 – as well as subsequent updates to the official projections, including the 2016-based projections scheduled for release in summer 2018. The analysis contained in the report strongly indicates on the basis of demographic projections and market signals alone that the calculated need for housing for the borough will exceed Option 2 by some way, and is unlikely to be lower than 900 dwellings per annum.
- Dacorum BC is at the early stages of preparing a new comprehensive local plan. That plan will need to ensure that it meets the full development needs for borough for the period to 2036.
- The council's own evidence base demonstrates a need to plan for a significant increase in housing, necessitating a review of the Green Belt. It confirms that in order to achieve sustainable development the majority of new housing should be primarily directed to the main settlements of Hemel Hempstead, Berkhamsted and Tring which each contain a full range of services.
- Reports and studies prepared on behalf of Harrow Estates clearly demonstrate that the housing requirement for Dacorum should be at the upper range of the council's assessed options (c.1,100 dpa). There is a particular need to identify sufficient land for housing development in Tring to address a widening affordability gap and aging population profile; a minimum of 2,100 dwellings is required for the town.

Turley Economics has been appointed by Harrow Estates plc to prepare an assessment of the local need for housing in the borough and in Tring in particular. The Issues and Options consultation presents a range of housing growth options for Dacorum (602 – 1,100dpa); these could see up to 3,167 new homes provided in Tring over the emerging plan period.

#### **Need for Housing in Dacorum**

The Government is committed to addressing the need to build more houses of the right type in the right places. The Council has historically failed to plan for or provide the homes that are needed in Dacorum, with housing completions falling short of a trajectory which itself was found at adoption to be insufficient to meet housing needs over the long-term. The strong need for larger family homes has also not been met by the recent profile of delivery, which has been orientated towards flats and smaller housing. The Inspector examining the Core Strategy concluded that an early and comprehensive review of housing needs must be undertaken.

The Council's own evidence for the new Local Plan suggests that **756 dwellings per annum** are needed in Dacorum over the emerging plan period (2013 – 2036).

The Issues and Options consultation document also recognises the Government's proposals for a new standardised method for calculating housing needs, which suggests an annual need for **602 dwellings per annum**. The Council acknowledges, however, that this is directly reduced as a result of a proposal within the methodology to cap housing needs at 40% above requirements adopted less than five years ago, which – when removed – implies a need for around **1,100 dwellings per annum** in Dacorum.

If the Government methodology is progressed in its current form, the application of this cap in Dacorum would expire next year, once the Core Strategy is more than five years old. The Council has therefore identified this level of need as forming the upper end of the range of growth options proposed, with all three options indicating a need for significantly more homes than currently planned for (430dpa) or that has been delivered on average in recent years (386dpa delivered between 2001 – 2016).

Turley Local Needs Report strongly concludes that the capped outcome of the proposed formula (602dpa) is not representative of housing needs in Dacorum, being unduly influenced by an adopted requirement found at adoption to be insufficient to meet the borough's housing needs. There is a high degree of circularity in any such argument being used to continue to constrain the supply of housing in an area of evidentially high housing need. The expiry of the justification for this cap in September 2018 further justifies the dismissal of this as a credible option in representing housing needs. **The lowest growth Option 1 (602dpa) therefore should not form the basis for the emerging Local Plan.**

Option 2 (756dpa) aligns with the Council's latest published objective assessment of need (OAN). This is presented as adhering to the current methodology prescribed through Planning Practice Guidance (PPG) and drawing upon evidence available at the time of its publication in January 2016. Whilst it is broadly considered that this OAN has followed the methodological steps required, it is apparent from the evidence presented within Turley's report that it is now based upon outdated information. The 2014-based household projections represent the most up-to-date '*starting point*' projection of need and have not been taken into account within the Council's Strategic Housing Market Assessment (SHMA). These projections suggest that a continuation of more recent demographic trends in Dacorum will generate a base need for 768 dwellings per annum.

In accordance with the SHMA, it is agreed that further uplifts – in line with adopted guidance – are required to allow for improvements in younger household formation and reflect clear market signals evidence of a widening affordability gap. The outcome of these adjustments and the integration of the latest datasets therefore clearly establish that the **full need for homes in Dacorum**

	<p><b>exceeds the level of provision proposed under Option 2 (756dpa).</b></p> <p>In the circumstances, the conclusion of Turley’s analysis is that two out of the three growth options consulted upon will fail to provide the level of housing growth needed in Dacorum. Of the options presented – and on the basis of the evidence published by the Council – <b>Option 3 (1,100dpa) is considered to represent the most appropriate basis for progressing the emerging Local Plan by identifying housing land and its distribution.</b></p> <p>It is recognised that the calculated level of need will need to be updated to take account of the Government’s proposed standard method in its final form – which is anticipated in early 2018 – as well as subsequent updates to the official projections, including the 2016-based projections scheduled for release in summer 2018. The analysis in this report strongly indicates on the basis of demographic projections and market signals alone that the calculated need for housing will exceed Option 2 by some way, and will be unlikely to be below 900 dwellings per annum even following the application of the current guidance.</p> <p>Further details are set out in the Turley Local Needs Assessment report submitted with these representations</p>
<b>Include files</b>	<a href="#">Olivia Carr Harrow Estates - Tring_Local Needs Assessment_Socio-Economic Report_PDF.pdf</a>
<b>Number</b>	Question 16
<b>ID</b>	LPIO22497
<b>Full Name</b>	Mr & Mrs Lisa-Lotte & Henrik Hansen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	<p><b>Please find below our response to the new Local Plan consultation. I fully support Brag’s response on this matter (see below)</b></p> <p><b>D) 476 Urban Capacity</b></p> <ul style="list-style-type: none"> <li>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</li> </ul>

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should

	<p>be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> <li>• 14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22547
<b>Full Name</b>	Mrs C Longbottom
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p><b>I support all answers and comments to the Issues &amp; Options Consultation document noted on the Berkhamsted Town Council website</b></p> <p>Growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints, particularly infrastructure, as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <p>The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. Berkhamsted is already near its estimated infrastructure capacity. Such disparities within Dacorum must be taken into account when assessing development numbers and site options going forward. DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be</p>

	<p>incorporated which should amount to a minimum of three years housing supply.</p> <p>Para 6.1.14 is a misleading paragraph which appears to be designed to justify a high housing target. The Government consultation does not indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to disadvantage authorities working on updating their plans, indeed the consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</p> <p>An Inspector may conclude that a local plan does not need to provide for its objectively assessed housing need if there are significant constraints. In a report dated 29 September 2017, in respect of the Adur Local Plan, the Inspector agreed that Adur District Council could not satisfactorily deliver its OAN for housing sustainably because of "the significant constraints that exist" and concluded that the Council's approach to housing was justified (PINS/Y3805/429/6 refers).</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22581
<b>Full Name</b>	Berkhamsted Schools Group
<b>Company / Organisation</b>	The Berkhamsted Schools Group
<b>Position</b>	
<b>Agent Name</b>	Kevin Rolfe
<b>Company / Organisation</b>	Aitchison Raffety
<b>Position</b>	Group Director, Development & Planning
<b>Housing numbers - Please provide your chosen option</b>	b) The figure of 756 homes a year
<b>Your response - Please add your response here</b>	<p>It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that the council should therefore plan for a minimum of 756 dwelling per year. However, the Council also need to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, at least one year before the date that the new Local Plan is due to be adopted. Under the Government's draft standard formula the calculation of housing need increases to 1,100 homes a year.</p> <p>This approach will ensure that in the event that the new higher growth level is introduced as planned, Dacorum will have sufficient sites to provide for the housing growth required. In the event that the new formula is not introduced before the new Local Plan is adopted, the council can fall back on the SHMA figure of 756 dwelling per year.</p>

If the new higher figure is not planned for now, and the new standard formula is introduced as planned, this would leave the Council in a very vulnerable position at the submission or examination stage of the local plan, as it could not comply with the test of soundness. Paragraph 47 of the NPPF requires that Local Plans meet the full, objectively assessed needs for market and affordable housing, which could be 1,100 homes a year at that time.

If the new standard formula is introduced, but not planned for, this would inevitably delay the adoption of the emerging local plan. Without an up to date Local Plan, paragraph 14 of the NPPF would be engaged, and the council would be less able to control the location of new housing development in the Borough. It is therefore important that the council plan to meet the current minimum figure of 756 dwelling per year and also the proposed higher figure of 1,100 homes a year.

It is not appropriate for the Council to plan for less than 756 dwelling per year, as this represents the current most up to date assessment of housing need. As noted above, paragraph 47 of the NPPF requires that Local Plans meet the full objectively assessed housing need.

The consultation document asks for views on whether the council should provide for only 600 homes per year. However, this figure is only 40% of actual need (based on the new methodology) and only applies for a limited time until Sept 2018 when the Core Strategy will be 5 years old. After this time, the full 1,100 homes a year will be required, so the emerging local plan will need to plan for this higher level of growth.

For the above reasons, the emerging local plan needs to plan for a minimum of 756 dwellings per year and a maximum of 1,100 dwelling per year.

#### **Case in support of proposed allocation**

- It is considered that the release of Haslam Fields from the Green Belt and its allocation for housing, along with the relocation of the existing playing pitches to land at Haresfoot Campus, is justified in planning terms. We wish to make the following comments in support of our case:

#### ***Significant contribution to Housing Land Supply***

- DBC's Core Strategy was adopted in September 2013, but only on the basis that DBC would undertake an early partial review to deal with issues relating to housing land supply. The adopted Core Strategy covers the plan period to 2031 and the early review, now referred to as the single local plan, is currently scheduled to be adopted during summer 2019.
- Prior to the adoption of the Core Strategy, DBC was subjected to a High Court challenge during which the soundness of the plan was tested. It is clear from the Inspectors report into the Core Strategy, and from the subsequent Judge's decision, that the Council had not proven that they had catered for its housing need over the entire plan period.

- The adopted Core Strategy is based upon the provision of a net increase of 430 dwellings per annum, whereas the relevant population projection at the Core Strategy stage suggested that a much higher level of housing growth, 540 dwellings per annum, would have been more appropriate at that time.
- To inform the preparation of the partial review (the single local plan), DBC commissioned a number of pieces of background technical evidence, namely a SHMA and economic study, a SHLAA, a Green Belt study (phase 1 and phase 2) and independent sustainability appraisals.
- The SHMA was published in February 2016. The report concluded at that time that on the basis of up to date population projections the objective assessed housing need for DBC as a whole should be 756 dwellings per annum in the period from 2013 to 2036. The above would represent a very significant increase in provision of some 326 dwellings per annum over the level of need included in the adopted Core Strategy.
- Since that time DBC have continued to progress their single local plan and a draft version of an Issues and Options consultation document was initially submitted to their Cabinet meeting on 19 September 2017. In that version of the draft document entitled “Shaping the growth of Dacorum” the Council had proposed consulting on three alternative levels of housing numbers. The lowest was 600 dpa (“Below Housing Need”), then 756 dpa (“Housing Need”) and finally 907 dpa (“Housing need plus”). In that draft version of the consultation document Council officers stated that their “suggested option” for housing numbers was 756 dpa therefore in line with housing need.
- However, prior to the Cabinet meeting taking place the government produced a new consultation document entitled “Planning for the right homes in the right places” This proposes a new method for local authorities to calculate housing numbers in the future and resulted in DBC deferring consideration of the original version of the draft Issues and Options document.
- The government consultation method of calculating housing numbers for DBC proposes a lower housing number of 602 dpa but only on the basis of the DBC having an adopted plan less than 5 years old. However, the DBC core strategy will be 5 years old on September 2018, by which time the consultation on the new plan will still be progressing, and an examination would not be until 2019. The Government intends to introduce the new method of calculating housing numbers in a revised version of the NPPF in Spring 2018. As such, by September 2018 (5 years after the Core Strategy was adopted) DBC may have to seek to provide for a much higher housing need of some 1100 dwellings per year.
- As a consequence of the proposed new method of calculating housing numbers, DBC amended their draft Issues and Options consultation



document. A revised draft version was considered by its Cabinet on 17 October 2017 and forms the basis of the final version of the current live public consultation document.

- The revised document “Shaping the growth of Dacorum” now consults on three growth options, the two previous options of 602dpa (now referred to as “Draft Government Figure”), 756dpa (“locally assessed need”) and 1100 dpa (“upper government figure” on the basis that the local plan will be more than 5 years old next year). DBC has not suggested a preferred housing need figure, and is seeking views on all three options.
- It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that DBC should plan for a minimum of 756 dpa. However, DBC also need to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, which is at least one year before the date that the new Local Plan is due to be adopted.

Source

Housing Need (per annum)

Our Comment

Current Issues and Options Consultation - Upper Government Figure

1100

This is the maximum that the Council should plan for. This will be the new level of housing need should the proposed government method be introduced.

Current Issues and Options Consultation

“ locally assessed need”

756

This is the minimum that the Council should plan for. None of the lower figures would meet current objectively assessed housing need.

Suggested option in the Draft report to Cabinet (Sept 2017)

756

SHMA (Feb 2016)

756

Current Issues and Options Consultation

“Draft Government Figure”

600

Planning for this level of need is not an option. This figure is only 40% of actual need (based on the new methodology) and only applies for a limited time until Sept 2018 when the Core Strategy will be 5 years old.

Population projection at core strategy stage

540

Planning for this level of need is not an option. This figure is superseded by the SHMA (Feb 2016).

Adopted Core Strategy (Sept 2013)

	<p>430</p> <p>Planning for this level of need is not an option. Does not meet housing need and is the reason for the early review.</p> <ul style="list-style-type: none"> <li>Whilst it is currently uncertain what final level of housing numbers DBC will need to accommodate because the government consultation document is not formal policy yet, what is not in doubt is that significant growth is appropriate. Regardless of the final housing number it will necessitate Green Belt releases.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22617
<b>Full Name</b>	Mr & Mrs Mehew
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	a) The Government's draft figure of 602 homes a year
<b>Your response - Please add your response here</b>	<p>We write as residents of [REDACTED]</p> <p>[REDACTED]</p> <p>in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) (<b>see comments LPIO18384, 18385</b>) and the draft response prepared by Berkhamsted Town Council.</p> <p><b>Berkhamsted Town Council Response:</b></p> <p>Growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints, particularly infrastructure, as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p> <p>The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. Berkhamsted is already near its estimated infrastructure capacity. Such</p>

	<p>disparities within Dacorum must be taken into account when assessing development numbers and site options going forward. DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.</p> <p>Para 6.1.14 is a misleading paragraph which appears to be designed to justify a high housing target. The Government consultation does not indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to disadvantage authorities working on updating their plans, indeed the consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.</p> <p>An Inspector may conclude that a local plan does not need to provide for its objectively assessed housing need if there are significant constraints. In a report dated 29 September 2017, in respect of the Adur Local Plan, the Inspector agreed that Adur District Council could not satisfactorily deliver its OAN for housing sustainably because of "the significant constraints that exist" and concluded that the Council's approach to housing was justified (PINS/Y3805/429/6 refers).</p>
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22654
<b>Full Name</b>	Ms Wendy Halford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Housing numbers - Please provide your chosen option</b>	d) Another figure (please specify).
<b>Your response - Please add your response here</b>	I now understand that the requirement for expansion and new homes is coming from the Central Government, and that your position is that Dacorum has no choice but to implement a plan, and it is better to do that carefully, rather than refuse, and then be subject to Central Government dictating where developments spring up. That makes sense
<b>Include files</b>	
<b>Number</b>	Question 16
<b>ID</b>	LPIO22694
<b>Full Name</b>	Lewis Claridge

Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	d) Another figure (please specify).
Your response - Please add your response here	<b>Question 16 – Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</b> No comment
Include files	
Number	Question 16
ID	LPIO22801
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Housing numbers - Please provide your chosen option	a) The Government's draft figure of 602 homes a year
Your response - Please add your response here	Population predictions are now going down. <b>Given uncertainties over the UK economy post-Brexit, it makes sense to proceed cautiously by choosing the lowest figure (602 homes per year) that may be lawfully adopted.</b>
Include files	

## Report Settings Summary

Event	<b>Local Plan Issues &amp; Options November 2017</b>
Total Responses	<b>22,707</b>
Total Respondents	<b>2,376</b>
Filtered Responses	<b>444</b>
Filtered Respondents	<b>428</b>
Questions	<p><b>Question 17</b></p> <p><b>Do you agree with the proposed approach to affordable housing?</b></p> <p><b>Yes / No</b></p> <p><i>If no, please explain what alternative approach, or changes to our current approach, you would like and why. Where possible, support your answer with reference to any evidence.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	<b>ID-4764254-QUESTION-17</b>
Pivot	<i>(none)</i>
Document Name	Question 17 - Summary Report
Created on	2019-04-17 14:23:40
Created by	Strategic Planning Admin

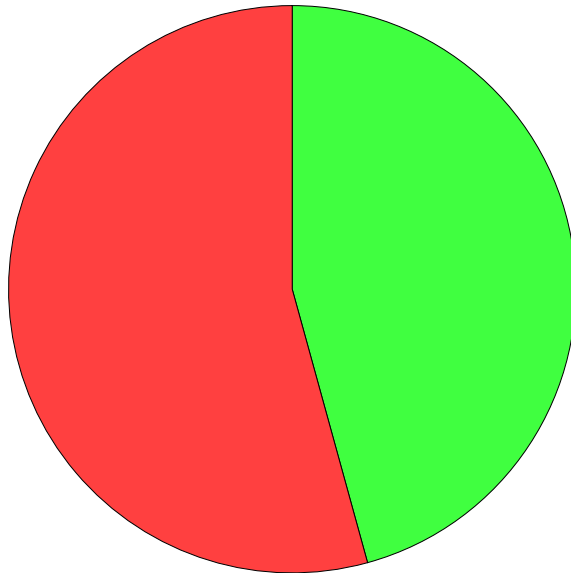
Your Opinion

Question responses: 444 (100.00%)

Question 17

Do you agree with the proposed approach to affordable housing?

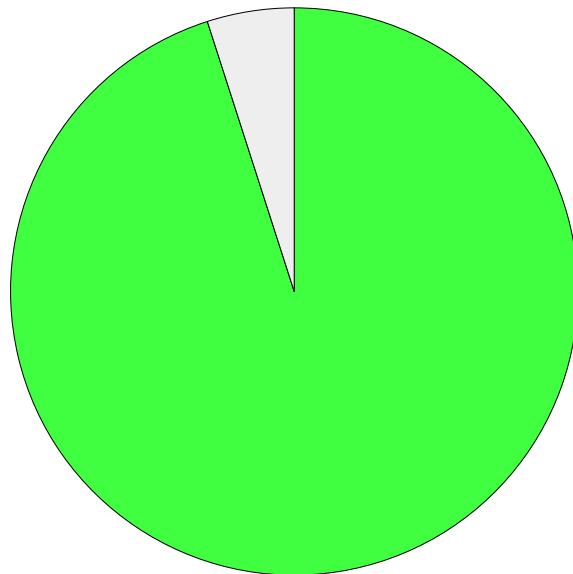
Yes / No



	% Total	% Answer	Count
Yes	45.72%	45.72%	203
No	54.28%	54.28%	241
Total	100.00%	100.00%	444

Responses

Question responses: **422 (95.05%)**



	% Total	% Answer	Count
Responses	95.05%	100.00%	422
No Response	4.95%	--	22
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>444</b>

Supporting evidence

Question responses: 4 (0.90%)



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	0.90%	100.00%	4
■ Responses with No Uploads	99.10%	--	440
Total	100.00%	100.00%	444



## Issues and Options All Responses to Question 17

<b>Number</b>	Question 17
<b>ID</b>	LPIO18
<b>Full Name</b>	Mrs Jennifer Ponsford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO38
<b>Full Name</b>	Mr David Munnery
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Given the high market values for houses in Hemel Hempstead and the growth in low wage employment as a national trend, the % of affordable housing should be increased above the current set target.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO86
<b>Full Name</b>	Mr John Lilley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Its a great idea, so long as the Developers are forced to do it. Most Developers have used clever legal loopholes to avoid building cheaper homes, the percentages never reach the targets. Better regulation is the solution. Why not make them build some Council houses, which are then NEVER sold to tenants.
<b>Include files</b>	
<b>Number</b>	Question 17

<b>ID</b>	LPIO144
<b>Full Name</b>	Mrs Lynne Head
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	For how long would an affordable home remain affordable in this area? I would like to see much more emphasis on social housing either run by a housing association or the local authority with affordable rent.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO171
<b>Full Name</b>	Mr John Shaw
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The whole question of affordable housing and how it is financed is far from clear. At the recent presentation given by the Borough their Representative was unable to give me the definition of affordable housing or how much it costs. If the developer is to subsidise the cost there will quickly become a limit to the number he can construct and make a profit.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO265
<b>Full Name</b>	Mrs David Warriner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	More and more unsuitable small houses are being snapped up by unscrupulous landlords who can make money with HMOs by subdividing rooms and packing in tenants. Housing is not affordable for young people to buy in this area. Rental properties like these are shamefully exploitative. More social rent housing is needed. Back to the principles that founded this New

	Town with spacious housing interspersed with green areas
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO313
<b>Full Name</b>	Mr Robert Spence
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	With regard to paragraph 6.2.9 above, all possible brownfield land should be built on before any green belt land is considered.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO332
<b>Full Name</b>	Mr David Stanier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Except it does not make clear whether the areas selected will each have the overall percentages
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO425
<b>Full Name</b>	Mrs Carole Freed
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO454
<b>Full Name</b>	Ms Julia Marshall

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO571
<b>Full Name</b>	Mrs Caroline Williams
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Land prices in this area mean that housing will not be affordable. Go further North and East and it is.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO629
<b>Full Name</b>	Mrs Carole Stokes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	More social housing needed. Affordable housing is purchased by buy to let landlords and then high rents are charged, pricing our local young people out of the area.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO669
<b>Full Name</b>	Mr David Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The bedroom and affordability split seems well balanced however I believe a significant proportion (perhaps 50%) of the 1 and 2 beds properties should be small houses with gardens and parking for smaller families and older residents and not apartments.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO750
<b>Full Name</b>	Mrs Victoria Vernon
<b>Company / Organisation</b>	Sport England
<b>Position</b>	Trainee Planer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Paragraph 6.2.4 refers to the creation of a brownfield register. Sport England seeks to ensure that when the brownfield register is compiled care is taken to ensure that any playing field sites are not included within the register as playing fields do not constitute brownfield land.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO802
<b>Full Name</b>	Mrs Catherine Marks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Affordable housing should stay as affordable housing. Many affordable houses have now been bought or are in the process of being bought and this is why we have a shortage and need more. I also don't believe affordable housing should be put in areas like villages that don't have the infrastructure or jobs to help people who need affordable housing in the first place.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO822
<b>Full Name</b>	Mrs Karen Bevan
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There needs to be an obligation for developers to actually build the number of affordable homes, they must not be allowed to buy out this obligation. Perhaps only allow them to build 'unaffordable homes' after the affordable ones have been built to a decent standard and are habitable.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO865
<b>Full Name</b>	Mr Stephen Bevan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Developers must be forced to build affordable homes and only when they have satisfied this requirement should they be allowed to build what are for the majority of people in the local community unaffordable homes.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO886
<b>Full Name</b>	Mr Ian Jones
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Developers must pay a penalty if sufficient affordable housing is not provided. They should not be allowed to buy out their obligation as they did for the development at Bank Mill.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO973
<b>Full Name</b>	Mr Robin Knowles
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	It seems the real quantity of affordable housing in the area is very low and any new development needs to provide a larger percentage than currently planned.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO978
<b>Full Name</b>	Mr Robin Knowles
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There should be housing available to enable the elderly to down size instead of forcing them out of the village. It is often the retired people in Kings Langley that do a lot of the voluntary work that gives our community that village ethos and we should be helping them to stay rather than trying to send them off to a very expensive care home.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO979
<b>Full Name</b>	Mr Robin Knowles
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1035
<b>Full Name</b>	mr Tish Seabourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	1 Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position • Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc. and their resale eliminated.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1093
<b>Full Name</b>	Ms Tish Seabourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	However it is important to stress that affordable housing must have easy access to public transport. Also social housing must be kept as social housing and not sold off at a later date.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1110
<b>Full Name</b>	Miss Melanie Mackney
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I think everything should be done to make more affordable housing available
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1132
<b>Full Name</b>	Mrs Saunders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	



<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There should be a larger percentage of affordable and social housing targeted at the local young people
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1148
<b>Full Name</b>	Mrs Morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The number of affordable homes should be driven by the Borough's policy. How is it right that developers could 'buy out' their obligations?
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1210
<b>Full Name</b>	Mr Bernard Richardson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1268
<b>Full Name</b>	Sarah Harper
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There have been many developments locally - some in Three Rivers - where the developers have not had to provide any affordable housing because it wasn't viable. The same will apply in all areas - if the policy is there

	why don't all the Councils have to enforce it equally? There is no point Dacorum being over run with affordable housing when other areas are allowed to ignore the requirement.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1357
<b>Full Name</b>	Mr Andrew Calderwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes, but must be implemented across the Borough. Affordable housing is needed in Berkhamsted also. Instead, luxury homes are built in Berkhamsted (shutting out our children who have grown up here in favour of wealthy commuters) and the affordable housing obligations of developers are fulfilled in Hemel or payments are made in lieu. This discredits the whole policy.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1399
<b>Full Name</b>	Mr Matt Clarke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Affordable housing (both sale and rented) are required to retain and attract people to the area.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1451
<b>Full Name</b>	Miss Penelope Allsop
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	If you stopped people buying to let, there would be a lot more affordable housing available over night
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1477
<b>Full Name</b>	Ms G Puddiphatt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Ref. 6.2.9. All green belt land must be excluded from this plan. Other options must be considered and route cause analysis done properly as to why we are planning for such an increase in development once again. Where is this going to end. Probably when all the green open space in Britain has been built over. This is not sustainable for our future generations.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1498
<b>Full Name</b>	Mr Chris Marks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Affordable housing should only be built in areas that have jobs, infrastructure and good transport links.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1564
<b>Full Name</b>	MR PETER SUMMERFIELD
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I agree with other comments made about developers buying out their obligation to provide affordable houses.

	They do not make a profit on these so prefer to build higher value larger houses.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1575
<b>Full Name</b>	Mr John Ingleby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The approach to affordable housing should include more options, with provision for rented accommodation in Housing Association schemes, and opportunities for appropriate groups to apply for self-build and co-housing schemes. Such schemes can provide sustainable new buildings of higher quality than developers' "affordable homes" by avoiding the developers' profit margin.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1578
<b>Full Name</b>	Linda Hattersley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	"Affordable" housing is not defined !! - we need genuinely affordable housing and schemes such as shared ownership to benefit young people who would like to stay in the town they grew up in, plus those on lower incomes/unable to work. It is great to see the new Council homes you are building in Berkhamsted.  As house prices are ridiculously high in our area, the builders will be making too much profit even on a so-called affordable home, plus buy-to-let owners will be able to charge high rents. How can we ensure these affordable new homes go to people in vital jobs locally, such as teachers and nurses?
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1612

<b>Full Name</b>	Mrs Susan Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Affordable housing is not achievable in Berkhamsted or indeed most of Dacorum. Most developers do not, for economic reasons, want it sitting beside commercially-priced housing. The Borough Council should aim to build social housing on modest sites within the Borough with capital input from developers, and protect it from Right to Buy.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1684
<b>Full Name</b>	Jenny Thorburn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I would like Dacorum BC to be developer for affordable homes as much as possible rather than relying on private developers. I am not happy about developments of housing in industrial areas such as at Maylands avenue - houses should be in areas which are pleasant to live in.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO1794
<b>Full Name</b>	Mrs Pamela Kingsland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I don't believe they will implement affordable housing whatsoever.
<b>Include files</b>	
<b>Number</b>	Question 17

<b>ID</b>	LPIO1851
<b>Full Name</b>	Mr Richard Case
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</li> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> <li>• There are property companies who will work on 100% affordable schemes (20-100 dwellings), looking to have a mix of sale, shared ownership and renting in enough proximity to make the scheme manageable by them over the long term.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2060
<b>Full Name</b>	Mr Christopher Giddings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Given the average price of a 3 bed house in Kings Langley (around 400-500k), application of a 20% discount brings the typical price of such a property to be £320-400k. Given the councils own calculations of average salary in the borough being £30k, a family with 2 full time employed adults would only be able to afford a mortgage of £240k assuming a 4x salary multiple. Given prevailing house prices, affordable houses will

	<p>still be unaffordable for the average resident of Dacorum.</p> <p>The proposed development plans are unlikely to exceed housing demand therefore prices will continue to rise in the borough. Houses will not be affordable.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2065
<b>Full Name</b>	Mr Lawrence Sutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Any developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation. This is clearly not happening in the current plans and developers must not be allowed to build 'executive' homes in Berkhamsted because this will generated them the most profit.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2164
<b>Full Name</b>	Mr Les Mosco
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Affordable housing, rented as well as owned, should be delivered as part of site development and not allowed to be 'bought out' by developers on spurious 'viability' grounds. Development permission for land already owned by a developer will still benefit from 'planning gain' even if affordable housing is insisted upon, simply a smaller development gain. We should shed no tears that developers only make smaller profits. Similarly, land purchased by a developer will be bought for less than current inflated prices, but still allowing substantial profit to the current landowner. Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p>
<b>Include files</b>	
<b>Number</b>	Question 17

<b>ID</b>	LPIO2213
<b>Full Name</b>	Mrs Melanie Flowers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	All areas in the Borough should have a requirement to provide affordable housing and developers should not be allowed to opt out of providing it. If there is a true housing need then surely affordable housing need is always an important part of this. Otherwise all that will happen is developers taking the opportunity to buy green belt land and build expensive commuter developments which would not satisfy local need for housing, and would instead attract more commuters out of London. This would further inflate house prices and add to existing infrastructure issues.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2322
<b>Full Name</b>	Mr George Bull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	In the Tring area, site Tr-h5 is owned by the County Council so would presumably help DBC overcome some of the issues noted in sections 6.3.6 - 6.3.14.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2458
<b>Full Name</b>	Mr Paul Crosland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Under DBC policies, developers can easily escape from their obligations to provide affordable housing, by a) developing fewer than 11 units or claiming that 'building affordable housing is not viable'. Such a situation cannot



	be permitted to continue. Affordable housing should be provided 'on site' as part of a mixed development and not in a remote setting - potentially even in another part of the borough. Affordable housing should, where possible, be sited in areas where employment, public transport, education etc. are available.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2475
<b>Full Name</b>	Mr Timothy Copeman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2544
<b>Full Name</b>	MRS Lesley Culley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am in favour of as much affordable housing as you can possibly deliver. 35-40% is not enough. Dacorum does need places for lower paid workers, and vulnerable people to live. You will not be able to rely on section 106 type agreements to deliver it. Developers seem to wriggle out of it ( e.g. Townsend Drive Berkhamsted!) or whittle it down to the lowest possible number and the least desirable sites in spite of your best efforts. So you need to get land into your ownership (or that of Housing Associations) and develop it yourselves. Deliver a high proportion of social rented if viable and certainly some shared ownership etc rather than low cost sales.</p> <p>You refer to national policies and say that much will depend on national decisions. yes indeed, all the more reason to put some resources into mounting an effective local authority lobby, and perhaps developing your lobbying alliances with the voluntary sector too.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2652
<b>Full Name</b>	Mr Alan Andrews

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Not to the detriment of the local area and living conditions of current occupants. Being cramped in.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2665
<b>Full Name</b>	Mrs Sue Lower
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Given statements made regarding strengthening economic prosperity in order to support commercial enterprise and employment opportunities in market towns and villages to support rural enterprise I would expect a stronger approach to providing affordable homes in more village areas. This would ensure the villages would continue to thrive and cut down commuting etc. A lot of people would prefer to live in the villages they grew up in but are unable due to house prices, the continual movement of people from villages to towns means the villages suffer as its no longer economically viable to provide basic services
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2696
<b>Full Name</b>	Mrs Marriott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	What is price range for affordable homes? not enough information provided here to agree with the breakdown.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2812

<b>Full Name</b>	mrs Gillian Hooper
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I think th majority of homes built should be for first time buyers i.e. 1 - 2 bedroom homes.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2871
<b>Full Name</b>	Mr Antony Harbidge
<b>Company / Organisation</b>	Berkhamsted Residents Action Group (BRAG)
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO2957
<b>Full Name</b>	Mr John Lunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The term "Affordable" housing is not defined.</p> <p>There is a need for genuinely affordable housing and schemes such as shared ownership to benefit young people who would like to stay in the town they grew up in, plus those on lower incomes/unable to work.</p> <p>As house prices are ridiculously high in our area, the builders make too much profit even on a so-called affordable home, plus buy-to-let owners will be able to charge higher rents. How can we ensure these affordable new homes go to people in vital jobs locally, such as teachers and nurses?</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3082
<b>Full Name</b>	mr hugh siegle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Yes but. Any policy on 'affordable' must applied. Worth looking at the Mayor of London's draft plan. 'Affordable' elements of a development may reduce development profits or development gains, which is not the same as making a development unprofitable. It is not the role of planning to deliver substantial gains and profits.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3204
<b>Full Name</b>	Mrs Juanita Mann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Good quality affordable and social housing which extends a community is needed</p> <p>Large semi isolated estates with not facilities but thousands of cars are not the answer</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3219

<b>Full Name</b>	Dr Jennifer Howes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	It is unrealistic to suggest that affordable homes will be constructed in Berkhamsted. Developers in Berkhamsted have focused on constructing luxury homes rather than affordable housing because of the strong market for luxury houses in Berkhamsted.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3282
<b>Full Name</b>	
<b>Company / Organisation</b>	Premier Property Acquisition
<b>Position</b>	
<b>Agent Name</b>	Mr Jonathan Buckwell
<b>Company / Organisation</b>	DHA Planning
<b>Position</b>	Director
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	My client is willing and able to provide 40% affordable housing as part of any development at Ivy House Lane.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3342
<b>Full Name</b>	Mrs Margaret Stanier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I strongly support requirement for 40% of affordable housing on large sites, and for 100% affordable housing in villages in order to deal with local housing need. Affordable should also mean realistically affordable.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3364
<b>Full Name</b>	Mrs Diana Calderwood
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	There is a 'need' for affordable housing yet although promised, this type of housing never realises. 'Fines' are paid and housing built elsewhere. So promises of affordable by developers seems to act as a gesture but does not provide for the need of our young folk starting out on the housing ladder in Berkhamsted.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3373
<b>Full Name</b>	Mrs Victoria Bate
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Truly affordable housing could be provided by Housing Charities.. homes built for profit should be consigned to history, lets start really providing proper eco affordable, future proofed housing that profits the people who live in them, and not property developers.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3379
<b>Full Name</b>	Mr B. Bradnock
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Please see paragraph 2.30 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (8)</a>
<b>Number</b>	Question 17
<b>ID</b>	LPIO3425
<b>Full Name</b>	Mrs Ann Johnson
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Affordable housing should be centred within existing towns which have the infrastructure, jobs and transport. It should also have restriction to enable local people to be considered first and should not be sold off.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3479
<b>Full Name</b>	Mrs Louise Saul
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	A good idea but in reality the price of land and the current average house prices mean housing will not be affordable to those who truly need it. Consider more social housing. I also agree with other comments re landlords and high rents
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3513
<b>Full Name</b>	Mr Ashley Martin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Developers should not be able to "buy out" the affordable requirement on the grounds of "viability". This has been a weakness of too many councils in granting planning for too long.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3549
<b>Full Name</b>	Dr Rachael Frost
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	"Affordable" housing is not defined - homes that are actually affordable are urgently needed in Dacorum, particularly for young people, and in areas not just in Hemel to increase the diversity of these areas. At least 50% of housing should be affordable (it seems shocking that more than half of homes built should NOT be affordable for people?!), although I highly doubt the developers will build reasonable flats and houses that can be rented or bought (according to Rightmove 2012 stats, a couple needed to be on >62k to afford a 2 bed flat in Berkhamsted back in 2012). This should be done in ironclad terms that cannot be reduced by payouts, and frankly if developers do not want to build on that basis that is only advantageous for our struggling infrastructure. Infrastructure commitments are also needed. Social housing is very important and needs to be provided for so we do not end up with people struggling in fuel or food poverty or homeless (an increasing issue in Hemel particularly). Housing that suits the needs of older people (e.g. sheltered housing, extra care) also needs to be considered giving the ageing local population. Dacorum should be everyone, not for a rich few.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3576
<b>Full Name</b>	Mrs Sandra Jackson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>You state "The majority of land promoted through this process was large sites in the Green Belt." This is because developers will maximise their profits through building high cost homes on Green Belt land.</p> <p>Affordable housing is a catch-all term which implies the housing will be affordable but 85% of expensive is still expensive.</p> <p>Quite frankly, no one wants social housing in their neighbourhoods.</p> <p>You have provided some fancy tables and diagrams, as well as a picture of Maylands Avenue development but building homes in a commercial zone reduces the amount of commercial land available. My unsubstantiated guess is that a very large proportion of residents of Maylands Avenue don't work within walking distance of their home - I would be happy to be corrected.</p>



	The simple fact is that there is pressure for homes in this area because it is a nice area to live, it is somewhere to aspire to live. Don't damage this area by filling all the spaces with concrete and reducing quality of life for all.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3651
<b>Full Name</b>	Mr Gruff Edwards
<b>Company / Organisation</b>	Dacorum Environmental Forum Waste Group
<b>Position</b>	Chair
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	No. See our responses to Questions 16 and 36.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3674
<b>Full Name</b>	Ilyn horne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	We need genuinely affordable housing schemes that are aimed at local people who would like to remain in the area that they grew up in or have been living in. Not aimed at anybody - ie, buy to let.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3697
<b>Full Name</b>	Mr Andrew Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Generally yes, as its essential for local and public services. However the quandary within Berkhamsted/Northchurch is the absence of jobs for those people requiring affordable housing. Again the objectives are in the wrong priority order.

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3729
<b>Full Name</b>	Mr Peter Howard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	There should be at least 40% affordable housing in any new development, and the developer should not be able to reduce this percentage on grounds of financial viability
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3776
<b>Full Name</b>	Mr Anthony Warren
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I don't agree with the assumed housing capacity in Markyate of 200 given the recent poor developments with the impact on infrastructure is out standing . Plus I think it is totally wrong not to assess every village in the borough like Aldbury, Long Marston.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3825
<b>Full Name</b>	Mr Michael Arrowsmith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Agree with the approach outlined but developers should be held to account in providing affordable housing and DBC should robustly defend against the viability argument.
<b>Include files</b>	
<b>Number</b>	Question 17

<b>ID</b>	LPIO3842
<b>Full Name</b>	Mrs Suzette Phair
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3888
<b>Full Name</b>	Miss D Bryant
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	What proof is there that affordable housing will be available for people that have grown up in the village and who's families have lived here for generations? I cannot imagine for one minute that affordable housing will be built at Shendish next to a golf course.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO3965
<b>Full Name</b>	Mr Tim Varley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4029
<b>Full Name</b>	Mr R. Latham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia

	Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Please see paragraph 2.30 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (24)</a>
<b>Number</b>	Question 17
<b>ID</b>	LPIO4075
<b>Full Name</b>	Mr M. Chester
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Please see paragraph 2.30 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (40)</a>
<b>Number</b>	Question 17
<b>ID</b>	LPIO4129
<b>Full Name</b>	Mr D. Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Please see paragraph 2.30 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (56)</a>
<b>Number</b>	Question 17
<b>ID</b>	LPIO4132
<b>Full Name</b>	Mr Graham Hoad
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	60% non-affordable makes no sense. If developers cannot deliver sensible solutions then alternatives should

	be looked at including: LA procured infrastructure with self-build cooperatives, small builder plots, and housing associations. More flats for the over 55s and executive homes are not the priority.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4294
<b>Full Name</b>	Mrs Caroline Hargrove
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	6.3.5. "Family size" homes to be funded privately or by the council?? Some contribution needs to be made there has to be some element of planning and thrift where you cant afford to buy your own home... the council seems to be expected to provide everything down to the light bulbs!
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4313
<b>Full Name</b>	Mr Bruce Morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	DBC seem to taking the highest proportion in the SHMA analysis and adding to it. It is not clear how this housing will be positioned within the area to ensure that the character of the local towns and villages.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4321
<b>Full Name</b>	Dr Lucy Murfett
<b>Company / Organisation</b>	Chilterns Conservation Board
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	<p>In the AONB you can require affordable housing contributions on smaller sites than 11 or more. See for example the policy in the emerging South Oxfordshire Local Plan:</p> <p>"Policy H9: Affordable Housing</p> <p>On all sites where there is a net gain of 11 or more residential units* the council will require at least 40% of the residential units to be affordable housing, subject to the viability of this provision on each site.</p> <p>* except in the AONB where there is a net gain of 6 or more residential units the council will require at least 40% of the dwellings to be affordable housing.</p> <p>this provision will be sought as a financial contribution with the amount to be the equivalent to the cost of providing the affordable dwellings on-site."</p> <p>Source: South Oxfordshire publication stage local plan Oct 2017,  <a href="http://www.southoxfordshire.gov.uk/media/2461/Planning-and-Development-Strategy-2017-2022.pdf">http://www.southoxfordshire.gov.uk/media/2461/Planning-and-Development-Strategy-2017-2022.pdf</a></p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4373
<b>Full Name</b>	Mr Philip Homer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>You do not define what affordable actually means.</p> <p>You do not guarantee that these affordable homes will be provided to people from the local area who work locally which is what they should be for.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4377
<b>Full Name</b>	Mr Adrian Bate
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4446

<b>Full Name</b>	Mr Robert Bailey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4448
<b>Full Name</b>	Mrs Caroline Hargrove
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	KINGS LANGLEY CAPACITY 50? so propose to integrate the town with Hemel and Apsley and build 200 homes I don't understand this
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4703
<b>Full Name</b>	Mr Keith Bradbury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4763
<b>Full Name</b>	Mr Andrew Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I would support and be more in favour of the intermediate housing proportion increasing to 30% from 20%. It gives those who wish to get onto the housing ladder a far better deal and more of a return, adding value to the money they pay for housing. On the same not I feel that keeping the 35% of affordable housing on any greenfield sites also offers a fairer system than increasing the level to 40%. When it comes to building on Greenfield sites I would suggest there would be more support for a 35% allocation rather than the 40% being considered.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP104782
<b>Full Name</b>	Mrs Joanna Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Developers MUST be forced to provide the number of affordable homes dictated by DBC policy.They must not be allowed to "buy out" their obligation.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP104855
<b>Full Name</b>	Mr Abel Leathem
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I agree with the proposed mix of affordable housing but only providing it is held as a contractual obligation for the developers and no reduction of the percentage of affordable housing will be allowed for them to meet their profit targets. Either they submit a plan that meets their profitability target whilst also meeting the percentage of affordable housing and meets all new building safety legislation or their plans are automatically rejected with no appeal allowed.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP104883
<b>Full Name</b>	Mrs Beverley Griffiths



<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO4982
<b>Full Name</b>	Ms Anette Corbach
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5028
<b>Full Name</b>	Mr Chris Lumb
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	But, whilst the stated approach is very laudable on paper, I am not convinced that Dacorum has the ability to make it work. The description of a house or apartment as 'affordable' seems to be a degraded term, when developers are permitted to classify a proportion of the houses they build as 'affordable' merely by charging 80% of the sum that they are charging for other houses in the site concerned. Thus, where the houses being built are priced at up to £1million, those that are termed 'affordable' will still be priced at a level that first time buyers have no chance of affording - they are thus 'unattainable'. Obviously this is going to be more of a problem in towns like Berkhamsted that may be seen as more 'desirable' by wealthy people who wish to live closer to a public school, or to live in a 'Market Town', but this is not to say that there won't be a need for 'attainable cost' housing in Berkhamsted for people that who need to take up industrial or commercial employment in the town. In this connection, DBC should absolutely refuse to accept arguments from Builders that

	<p>they are unable to justify the inclusion of such 'affordable' housing as they have been told to include. And the siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p> <p>I believe there should be legislation in place to allow councils to specify exactly what classes of property should be built on any particular site, and what the minimum housing density should be, though I guess there may be little chance of such a fair system being introduced.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5073
<b>Full Name</b>	Mr Peter Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Council has an abysmal record on supplying affordable homes in Berkhamsted.</p> <p>Where affordable housing is provided, it needs local employment, good access and transport links. None of the proposed sites in Berkhamsted offer these necessities.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5249
<b>Full Name</b>	Mrs Catherine Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As much affordable housing as possible is required throughout Dacorum, in view of the present house prices. I appreciate your concerns about the systems beyond your control and appreciate any efforts to try to set a lower threshold than 10 houses. which has enabled so many developers to provide only executive homes and nothing "affordable for so long.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5271
<b>Full Name</b>	Mr Gary Ansell

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The approach to affordable housing does not go far enough. For 1 and 2 bedroom homes, there should be a higher proportion of affordable homes allocated than 30-35%. 45-50% would be preferable. Also affordable in our part of the UK is not practically affordable, therefore more shared ownership / part rented accommodation is required. The problem is DBC are unable to enforce the levels of affordable homes being developed, therefore the targets are unlikely to be met, therefore the percentages of affordable homes need to be higher.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5320
<b>Full Name</b>	Miss Giulietta Cinque
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Housing should only be built in areas that have jobs, infrastructure and good transport links "If you stopped people buying to let, there would be a lot more affordable housing available over night" Totally agree. Impose much higher taxes on buy to let properties in order to discourage it. If you encouraged smaller families i.e. 2 children per couple, this would reduce the future need for housing and the future burden on schools and hospitals All green belt land must be excluded from this plan. Other options must be considered. Where is this going to end. Probably when all the green open space in Britain has been built over. This is not sustainable for our future generations.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5443
<b>Full Name</b>	Mr Pdraig Dowd
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>You have inadequate data to define likely accommodation requirements and additionally, you look at the issue in incremental terms.</p> <p>You have thrown out some allocations as to particular types and done so in a vacuum. The 'UK' housing' issue needs more insights that are not mere suggestions, which applies across the country and not just DBC. It is too big an issue to leave to a push from politicians and have a knee jerk response.</p> <p>Only by having a better data set can you define what you may require and then only consider 'affordability' after that. Please don't confuse the two as affordability involves many elements that have nothing to do with supply.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5489
<b>Full Name</b>	Mr Garrick Stevens
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>A Firstly, the prevailing policy relies on developers to include [or contribute] affordable homes. This approach is failing to provide the necessary quantum and mix of dwellings locally or nationally. The policy should be changed to allow the LA to fund local <i>affordable/social</i> dwellings and not be solely dependent on developers.</p> <p>B That said, so long as current policy prevails, affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. I agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. Too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc as the site to which it relates – to meet the <i>local need</i>.</p> <p>C Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</p> <p>D Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken</p>

	up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard. This bodes ill if there is inadequate social housing to attract e.g. key workers in an area that has high purchase or rental costs.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5515
<b>Full Name</b>	Ms Geraldine Whiteside
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	No housing development should take place in what is currently designated green belt. None of the Kings Langley sites mentioned in the plan, including Shendish, are acceptable because they are in the green belt. Whilst agreeing in general that affordable housing should be made available, in view of the above, there is no scope in Kings Langley/Shendish, for such development.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5541
<b>Full Name</b>	Mr Bob Hattersley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The approach to the proportion of affordable homes here (and in the country in general) seems to be to set the bar low and complain feebly when even that bar is kicked aside by the developers. The proportion of very wealthy people in this country for whom half a million pounds is a reasonable price to pay for a house is not increasing - only a small proportion is getting wealthier. Build homes for people. Stop letting the tail wag the dog.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5678
<b>Full Name</b>	Mr Alastair Greene
<b>Company / Organisation</b>	Little Gaddesden Parish Council
<b>Position</b>	Clerk

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5716
<b>Full Name</b>	Mr Andrew Kennett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I agree with the target of 40% affordable homes. It is important that developers are not allowed to backtrack on commitments to affordable housing after they have received planning permission which has been shown to happen.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5763
<b>Full Name</b>	Mr Quentin Ross-Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Affordable house must be affordable and remain affordable at resale. Considering the price of houses in some areas of Decorum, I'm not sure people will still be able to purchase them even at a cheaper price.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5862
<b>Full Name</b>	Mr Michael Lelieveld
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	Yes. There is a pressing need for affordable housing for local residents and it is vital that the Council ensure affordable housing is built in the local area in order to meet the goal of creating sustainable and diverse communities.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5886
<b>Full Name</b>	Mr Grahame Partridge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers.</li> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5914
<b>Full Name</b>	Mr Philip Catchpole
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Given the reliance on private developments at market prices and such little provision of council housing because of the inability to raise capital I do not see how we will ever have sufficient truly affordable housing in Dacorum.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5955
<b>Full Name</b>	Mrs Rosemary North
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Berkhamsted does not need any more 'luxury' or high spec housing. Married couples need to be able to afford a first home on an average salary, not a banker's salary. What hope does a single person have to buy a place of his/her own rather than spending his/her life renting a property?
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO5957
<b>Full Name</b>	Ms Fiona Coulling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Need to align with allocations policies and consideration of overall affordability needs to be assessed. Affordable rents at 80% of market are still too high for those on minimum or living wage - consideration of some of the initiatives for shared living/ work spaces to attract talent to the area so there is a more diverse economy and workforce.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6017
<b>Full Name</b>	mr michael hicks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6020
<b>Full Name</b>	Steve Pitts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The definition of affordable housing is nonsensical in this area. An affordable house should be one that, as an absolute minimum, a local couple on 10% less than the average wage for the area would be readily able to obtain a mortgage to buy. Anything more expensive than that is simply playing lip service to the idea and ensuring that youngsters brought up in the area will have to move elsewhere to buy their first home.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6047
<b>Full Name</b>	Georgina Tregoning
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6191
<b>Full Name</b>	Mrs Helen Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I do not believe that there will be any true affordable homes for people trying to get onto the housing market. Provision for social housing needs to be increased. Due to our proximity to London, the building of new homes will attract people moving to the 'more affordable' homes and not improve affordability for the local residents.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6267
<b>Full Name</b>	Mr Brian Goddard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Only housing for social means should be built as this is the real need for the building across the country
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6292
<b>Full Name</b>	Miss Lucy Muzio
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Stop private rents being so high then maybe there wouldn't be the need to build on greenbelt and farm land.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6322
<b>Full Name</b>	Mr andrew miller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The term 'affordable' is used in the wrong context, a higher % should be for tenants for council/housing associations to actually make them affordable, unfortunately developers will be looking to maximise profits rather than providing homes.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6332
<b>Full Name</b>	Mr andrew miller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Each area is bespoke and should be considered appropriately to ensure that the demographic doesn't alter considerably.

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6371
<b>Full Name</b>	Mr Nicholas Ring
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Affordable houses must be affordable for people on the average yearly income of £30,000.</p> <p>From my working experiences, I know that developers made a profit of 25% on all new homes they build. This enables them to "buy off" the requirement to provide affordable rented homes as stated by the planning approval process.</p> <p>A much better balance must be achieved by non-profit making organisations to provide the quantity of affordable homes and not rely on profit making private developers.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6382
<b>Full Name</b>	Dr Melvyn Else
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Affordable housing is and must be an essential part of the plan. In overall terms it needs to be possibly as high as 40% of the total but it is irrational to say it is 40% of every project. It must be 100% of some and much less for others.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6451
<b>Full Name</b>	Mrs anna silsby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	The entire policy on affordable housing is flawed. There is no such thing in Dacorum. What needs to happen is proper government policy to create social houses in areas of the country where housing can be cheaper. I.e. any focus on new housing development should be up North or in more deprived areas. That way those areas get further investment; and economic growth supported by the growth in the number of residents. In general terms the South East of England does not need that further support and house prices reflect the market situation. Artificially trying to create affordable housing in an area that is not affordable per se just implies trying to alter the market. That is not a job for the government. The government should work with the private sector to develop affordable houses in areas where that is possible - without further government intervention.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6664
<b>Full Name</b>	Mrs Victoria Janaway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Houses will not be affordable. It is a fallacy that this is benefiting those that need affordable housing. The house prices in Kings Langley are already out of reach of those on normal salaries. I fail to see if this would be the case here. It has not been the case in any surrounding developments.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6689
<b>Full Name</b>	Mr Nick Hollinghurst
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	But only with the caveat that the affordable homes should all be for rent at a social rent.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6770
<b>Full Name</b>	Helen Cole

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Affordable housing is definitely needed. However the definition of affordable housing is very vague / weak which makes targets largely meaningless. To me for housing to be affordable it must either be social housing with low rent set by the council not set by private profit making landlords, or it must be affordable with a mortgage of three times average earnings in that area. In Tring I believe average earnings are around 25K so a starter home at 150K would be just about affordable to a couple. I am not aware of any properties being sold in this range.</p> <p>There is no question here about available land and selection of land which seems to be an omission. Why has the approach been just to approach landowners who think they have suitable land, surely the council should be identifying the land, not the other way round, otherwise you are just playing into the developers hands and letting them pull the strings. This is not how successful strategy and policy making should work.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6782
<b>Full Name</b>	Mr Geoff Latham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>It is difficult to comment on a ratio - 80/20 looks too pat. The previously suggested approach of allocating an over supply of land should reduce prices to a more affordable level taking a number of people out of this category. The resultant land prices, particularly if not all taken up, would make it easier for Housing Agencies or Local Authorities to make provision for the very needy.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6823
<b>Full Name</b>	Mr Alan Horn
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Council seem to be getting in the excuses for the Developers before negotiations begin. The Council should be asking for the provision of 40% affordable homes across all developments.</p> <p>Year on year the number of social rent homes are reducing because of the right to buy scheme, therefore there should be no reduction in the 80% social or affordable rented homes, with the majority being social rent levels.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6857
<b>Full Name</b>	Mrs Pauline Mostyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Many of the comments already stated show just how much distrust there is around this issue of affordable homes and developers. What are they? Who should have them?</p> <p>Yes, ideally, there should be starter homes available so that young people can grow on from their parents homes and live and raise a family in the area they themselves grew up in. Smaller homes also for parents/grandparents wanting to downsize to release family homes. The question seems to be around who builds them. Developers are not trusted. I like the suggestion of self build possibilities, small groups being able to set up housing cooperatives and co-housing projects. And, going back to the Council providing housing. What was wrong with that. They weren't driven by profit but providing homes and a lot were good, solid family homes.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6897
<b>Full Name</b>	Bradford Gunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6952
<b>Full Name</b>	Mr Edward Castle-Henry
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>While I agree the affordable housing is required, there will come a time when capacity has been reached.</p> <p>Greenbelt land was put in place specifically to stop urban sprawl, and laid around towns and cities to protect them and create green buffer zones.</p> <p>If you are to start building on greenbelt land, you will actively be breaking down these protected areas, which we will not be able to get back. And once you start, when will you stop, there would no incentive to not just add a little more, and a little more if the price is right and you know you can build without repercussions.</p> <p>I stand against building on our greenbelt land.</p> <p>I noticed some of the land is owned by the crown estates, so i imagine what they are in control of, the corporation can sell off at will, and you can do as you please, within reason. If however there is public land which is on offer, I think your approach needs to be very different, and should not always go to the highest bidder, especially when whole communities come together and put forward ideas which benefit the whole community. I feel this goes against public interest and goes against the public themselves in favor of more money from a private entity. You may have made more monetary value, in the short term, but this is not the only value there is to be gained.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6961
<b>Full Name</b>	Mrs Jenna Selby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Will 'affordable housing' take into account that most people don't earn over 25k and so the new housing prices will reflect that?

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO6988
<b>Full Name</b>	mr michael hicks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	emphasis on starter homes should be added need should be accesed more locally
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7053
<b>Full Name</b>	Mrs Gillian Lumb
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I have been looking at the possibility of responding to the consultation about the local plan having been to see the display at Berkhamsted Civic Centre recently. However, as a resident of Berkhamsted fully engaged in other matters, it is not possible to find the time to respond to every point in your questionnaire.  Before responding to some of the questions in your consultation I would like to make the point that the national housing crisis is not going to be solved by building the kind of houses costing one million pounds or more seen recently in Berkhamsted. What we need is housing that the ordinary person can rent or buy on a limited budget. Young people from around here have been obliged to leave their parents and family connections to find housing further away from London. The recent development on the New Lodge site did not have any houses/flats that they could afford and the developers managed to wriggle out of their obligations in this respect.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7061
<b>Full Name</b>	Mrs Gillian Lumb
<b>Company / Organisation</b>	
<b>Position</b>	



Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As I mentioned in my introduction, developers have been allowed to get out of their obligations. There should be stricter control when sites are being developed. Affordable housing should be built where there is easy access to facilities, not on the top of hills with no bus route.
Include files	
Number	Question 17
ID	LPIO7107
Full Name	Mr & Mrs Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>Q 17.</b></p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>BRAG RESPONSE TO Q17 (FULL DOC ATTACHED TO Q46)</p> <p>Question 17</p> <p><i>Do you agree with the proposed approach to affordable housing?</i></p> <p>Yes</p> <p><input type="checkbox"/></p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy</p> <p>on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'.</p> <p>Developable land</p>

	<p>ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</p> <p><input type="checkbox"/></p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7182
<b>Full Name</b>	Rosemary & Michael Burnett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><a href="#">Affordable Housing - No</a></p> <p>Berkhamsted has already built its quota of houses all be it executive housing we need more two bedroomed houses for young and old people who want to down size and sell on their larger houses for younger families.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7200
<b>Full Name</b>	Mrs Emma Ball
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Please accept this as my objection to plans for more development permissions to be granted.

	I understand the need for an increase in housing stock across the country but believe that the proposals in our town will simply see more large, expensive homes which will do little more than perpetuate very high property prices for local people.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7205
<b>Full Name</b>	PETER & FELICITY WHITE
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	New and future housing is almost exclusively expensive. Social and affordable housing falls far short of current and future requirements.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7274
<b>Full Name</b>	Sophie Groombridge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Thank you for your email regarding Decorum's Local Plan – consultation on issues and options, (Chapter 6 Homes) listed in the document is of particularly relevant from a crime prevention perspective, however I can see no reference to security or crime prevention.</p> <p>I note that Decorum Council intend to provide a substantial amount of affordable homes, I would ask that the police approved minimum standard, Secured by Design is included.</p> <p>Building to the physical security of Secured by Design, will reduce the potential for burglary by 50% to 75% and will therefore reduce demand on the police</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7279

Full Name	Hilary Wight
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I object to the plan which I believe:</p> <p>- fails to address the need for affordable housing for young people, low paid public sector workers and older people;</p>
Include files	
Number	Question 17
ID	LPIO7318
Full Name	Brian and Heidi Norris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We fully understand the need for additional housing in this country, but it should not be to the detriment of towns such as ours. We do not intend to reply to the 46 questions one by one, but support the answers given by the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group and support Option 1B in the Strategy Plan. Even this number of 600 further homes is, in our view, more than enough, but we understand that is an existing commitment.</p> <p>BRAG response to Question 17 (please note full document is attached to Q46)</p> <p>Page 6 of 28 Question 17</p> <p><i>Do you agree with the proposed approach to affordable housing?</i></p> <p>Yes</p> <p><input type="checkbox"/></p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy</p>

	<p>on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'.</p> <p>Developable land</p> <p>ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned</p> <p>by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the</p> <p>second the original purchase cost will still be below market housing levels. This does not make a development unviable</p> <p>it merely reduces the gain from the award of a planning consent.</p> <p><input type="checkbox"/></p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7426
<b>Full Name</b>	Gill and Brian Lerigo
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Scope</b></p> <p>All recent developments within the town have featured the £750k plus properties suitable for commuters elsewhere. Apparently no one wants gardens any more so why do we not build low-rise, 3-4 storey buildings as have been built along Brook Street. As for affordability, what is needed is greater provision of smaller homes within the price range of people on average earnings for the area - definitely not the £750k bracket. The town cannot absorb this amount of new build constructed at the same time, all previous expansions of Tring, e.g.Grove, Silk Mill, Damask Close etc have all been built on a much smaller scale.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7440
<b>Full Name</b>	Diane and Norman Brooks
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Affordable Housing - No This countries present housing need is for starter/low cost/rented housing, which developers are not currently building in Tring. How will you ensure that any site would provide up to 40% affordable homes? It would appear to us that any landowner/developer will seek the maximum possible return on any green belt land released for building.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7460
<b>Full Name</b>	Mr Robert Scott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Finally I am concerned that the Council will simply focus on 'ticking boxes' to satisfy government requirements for increasing the number of dwellings and affordable housing numbers. Whilst it is easier to achieve the targets through high density apartment blocks and 1 or 2 bed units, there is a desperate need for quality family homes particularly in Hemel Hempstead. This is adversely effecting the demographics of the area, driving families away and having knock on effects, including the viability of quality retailers businesses in the town centre.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7467
<b>Full Name</b>	MR Christopher Kendall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Answer – NO There is no evidence of the need for affordable housing – in Dacorum the 35% target appears to be based purely on guesswork and to raise this to 40% for greenfield sites is illogical. It is unclear why people need to live

	locally. Historically it has always been necessary for many first time buyers to purchase in lower cost areas in order to join the housing ladder. There is a much greater abundance of affordable housing in high growth towns further from London but remaining within relatively easy commuting distance of Dacorum – such as Aylesbury and Milton Keynes. Unfortunately in desirable areas the price of even small properties are unaffordable for many.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7498
<b>Full Name</b>	Ruth Briggs
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There is no definition of affordable housing in the plan. Nor if the developers will be able to 'buy' out of this obligation to enable the development of larger, more profitable properties. The housing densities in the plan are not specific enough to show the type of housing to be built and therefore does not provide enough information to conclude if the plans meet the current housing need.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7678
<b>Full Name</b>	JUNE LIGHTFOOT
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes Developers must be made to build affordable homes. No buy-outs
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7722
<b>Full Name</b>	Mr James Curliss
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The very people that Berkhamsted and the surrounding area needs are being priced out of the housing market. This must stop and innovative ways to attract the right people so that they can get a step on the housing ladder must be found.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7724
<b>Full Name</b>	Zoe Ryder
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I fully support the need for more housing in Berkhamsted, particularly affordable housing, but not on a site that would actually be of serious detriment to the town.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7780
<b>Full Name</b>	Zandra Christie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I do appreciate there is a need for affordable homes, but doubt building in Bovingdon will alleviate this, even if some are earmarked for social Housing and shared ownership.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7831
<b>Full Name</b>	IMELDA DEMPSEY
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Furthermore, if your requirement is to meet affordable housing, what is the level of affordable? I am seriously concerned that any social or historic character is being eroded
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7859
<b>Full Name</b>	Dr Peter Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7943
<b>Full Name</b>	Mr Norman Groves
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to confirm that I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG RESPONSE TO Q17</p> <p><input type="checkbox"/></p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'ought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy</p> <p>on the percentage of affordable housing expected if a Council succumbs to the 'ability argument' Developable land</p> <p>ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned</p> <p>by a developer. In the first case development value will be reduced from a 'arket housing' level on disposal, in the</p>

	<p>second the original purchase cost will still be below market housing levels. This does not make a development unviable</p> <p>it merely reduces the gain from the award of a planning consent.</p> <p>□</p> <p>Siting of affordable housing needs to pay particular attention to accessibility –with easy low-cost access to public transport, employment, retail, education, health etc</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO7993
<b>Full Name</b>	Mr Michael Nidd
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>however.....</p> <p>Affordable housing should be delivered when identified as part of site development. There is little point in having a policy on the percentage of affordable housing expected if DBC later rolls over on the ‘viability argument’. There must be rigorous testing of any developer’s claim that a development is unviable – the provision of affordable housing merely reduces the gain from the award of a planning consent. DBC’s record in this area is not spotless, and <b>its 35% yardstick should be increased to 40% and rigorously applied</b>. It is in part because of historic under-delivery of affordable homes that the Government’s suggested “market factors” uplift on SHMA estimates might be applied.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8028
<b>Full Name</b>	A R MCVEY
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Affordability – the need is for affordable housing for local families of Tring, especially young people. Most of the recent developments have been of large, high-value</p>

	properties which is having the effect of turning this market town into a commuter town for London. To ensure the ongoing viability of the town and keep it multi-generational there needs to be affordable housing for young families.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8097
<b>Full Name</b>	MS MARY ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I concur with the local Labour party response:</p> <p><i>"People in Berkhamsted, Northchurch and Tring are sadly being let down yet again by the Conservative council. The draft Dacorum Local Plan not only sacrifices precious green belt, it also completely fails to show how the council is going to deliver affordable housing or address the severe lack of investment in supporting infrastructure.</i></p> <p><i>At a very well attended meeting at the Rising Sun, Berkhamsted on 6th December, local Labour Party members from Berkhamsted, Northchurch and Tring therefore resolved to reject Dacorum's draft Local Plan and the Options proposed which would all mean the sacrifice of green belt land. We are not prepared to see green belt lost so that land speculators make vast profits from yet more £1 million homes. Instead, we are committed to campaign for a plan which is genuinely designed to meet the needs of this community. We believe people want to see green belt only allocated for development if guaranteed that more than 50% will be genuinely affordable housing (and at least half of that social housing). Our own young people, as well as the carers, teachers and NHS staff our families depend on, can no longer afford to buy or even rent around here. We are very short of suitable and affordable supported housing for older people. Yet none of these needs are addressed by the draft plan.</i></p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8218
<b>Full Name</b>	Mrs Suzanne Nixon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>WHAT TYPE OF HOUSING</p> <p>More affordable housing and some smaller units please. Watching what has been built in Berkhamsted over the past 10 years, I am struck by how little of this is affordable. Retirement flats in abundance, large four bedroom detached homes and luxury flats. Little else, the exception being the excellent council houses in Farm Place.</p> <p>So often developers are allowed to opt out of affordable provision. This should not be the case. I can't help wondering what's in it for Dacorum Council? Why does this happen? Is it that the developer threatens to walk away if required to meet its target for affordable housing?</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8259
<b>Full Name</b>	Rob Wakely
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The draft Dacorum Local Plan fails to show how to meet the desperate need for more affordable and social housing for our young people, as well as the teachers, NHS staff, carers and other workers we need in this community;</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8402
<b>Full Name</b>	Helen & Stuart Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action group have responded in full to the issues and options consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation the we wish DBC to duplicate BRAG's responses under our name.</b></p>

	<p><b>However, we would like to take this opportunity to emphasize just a few of the most important points within that response</b></p> <p>Affordable housing is very much needed in the town - this should be a top priority.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP108417
<b>Full Name</b>	Spencer Holmes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p>

	<p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8439
<b>Full Name</b>	Mr Peter Shell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Because of the above I am not in a position to myself provide detailed answers to all the questions, but have seen the response prepared by BRAG and agree with their comments which should also be regarded as my own.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on</li> </ul>

	<p>disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8480
<b>Full Name</b>	Mrs Pat Berkley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG’s responses under my/our name.</b></p> <p><b>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q 17. Developers must be forced to provide the number of affordable homes dictated by the Borough’s policy. They must not be allowed to ‘buy out’ their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be ‘bought out’ by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the ‘viability argument’. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a ‘market housing’ level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</li> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8498
<b>Full Name</b>	Mr Lawrence Sutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8529
<b>Full Name</b>	Mrs Sarah Rees
<b>Company / Organisation</b>	



Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>Q 17.</b> Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
Include files	
Number	Question 17
ID	LP108662
Full Name	MRS G RUSSELL
Company / Organisation	
Position	
Agent Name	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	No 1- Needs to be a higher percentage of affordable housing, increasing to a majority percentage in villages. 2- Affordable should be truly affordable, so should be more Housing Association or social housing houses, which tenants are not allowed to buy. 3- Affordable housing should be near facilities such as GPs, shops, public transport. 4- There must be conditions put on affordable housing, so it is not acquired by landlords as "buy to rent". 5- Developers must not be allowed to "buy out" the affordable element. 6- Provision should also be made for self-builds and co-housing.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8754
<b>Full Name</b>	David Fitches
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I do not see the additional housing being affordable to Hemel people, so is social and starter housing being planned
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8766
<b>Full Name</b>	gregory lee
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I do not agree that any housing should impact on green belt land or that green belt in and around Kings Langley should be re-categorised in order to make it available for house building. To not impact on the quality of life for all generations that live in the village and to encourage the younger generation to stay I would look for alternatives on non-green belt land.

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8805
<b>Full Name</b>	Richard and Pru Murray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	If there is some housing to be had in Berkhamsted, it would make sense that it was on brownfield sites only (given our proximity to the Chilterns AONB and again it should be of affordable housing stock to balance up the socio-demographic mix in the town). There doesn't seem to have been much of this in recent planning developments.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8911
<b>Full Name</b>	Mrs Karen Roberts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I visited the exhibition about the proposed local plan and asked two representatives about affordable homes. I see that throughout the plan, there is a proposal that 40% of the homes will be affordable. I asked your representatives on the night if this was likely to happen once the plans had been passed and they like me, were not at all certain that this would be the case. It seems that a local plan will only be passed if there is a quota of 40% affordable homes, however, once passed, the council and contractors will go back on that commitment and nobody can do anything about it: it is the same as in London where the Mayor had promised 50,000 affordable homes yet only a fraction of this number are being built. In Berkhamsted, Taylor Wimpey have been very quick to build a large number of houses at Bearroc park yet we still await the mere 19 "affordable" homes - will they ever be built?</p> <p>I believe the wrong type of houses are being built as we need to ensure young local people can afford to buy their own homes (even if they do have to wait a lot longer than in the past).</p>
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO8959
<b>Full Name</b>	barney greenwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Developers must be made to build the affordable homes DBC calls for, not allowed to buy themselves out.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO8993
<b>Full Name</b>	David Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9016
<b>Full Name</b>	Mrs Susan Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9097
<b>Full Name</b>	LeverstockGreenVillageAssociation
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We accept that it is not possible to control who buys a new property, but LGVA considers that DBC should try to restrict the building of additional homes within the Borough to cater solely for local people rather than looking to accommodate inward migration.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9151
<b>Full Name</b>	AMANDA AND PATRICK MCGRATH
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As parents we are supportive of seeking options for affordable housing so that our son and his generation can hope to own or rent a property in the south east in future, and the proposal of 50 homes in Kings Langley does not seem unreasonable but sites need to be chosen with great care so as not to exacerbate existing capacity and congestion problems</p> <p>We, like others we know have moved into to Kings Langley for its village community and rural surrounds and would hate to see it swallowed up in what could eventually become one large conurbation of Hemel Hempstead, Apsley, Nash Mills and Watford.</p> <p>We would be grateful if you could confirm receipt and take every consideration to the very real and genuine concerns of our strong community.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9165
<b>Full Name</b>	S Langley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO9198
<b>Full Name</b>	Rob & Julie Wakely
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The draft Dacorum Local Plan fails to show:</p> <ul style="list-style-type: none"> <li>• how to meet the desperate need for more affordable and social housing for our young people, as well as the teachers, NHS staff, carers and other workers we need in this community;</li> <li>• how to ease the pressure on this part of Dacorum's creaking infrastructure (public transport, cycling and walking, roads, parking, schools and playgrounds, GPs, drains, water and utilities) from recent housing developments, let alone the demands of further housing development;</li> <li>• how further housing development is consistent with the stated aim to protect and enhance what local people love about where we live;</li> <li>• how the community can be guaranteed that new housing will be developed sustainably meeting the highest environmental standards; or</li> <li>• how development will avoid associated traffic worsening air pollution and road safety in Berkhamsted, Northchurch and Tring.</li> </ul> <p>We are opposed to the draft Dacorum Local Plan and the Options proposed which would all mean the sacrifice of greenbelt land. We are calling for Dacorum Borough Council to present a draft Plan which is genuinely designed to meet the needs of Berkhamsted, Northchurch and Tring, in particular:</p> <ul style="list-style-type: none"> <li>• greenbelt land only allocated for development where guaranteed more than 50% genuinely affordable housing (and at least half of that to be social housing)</li> <li>• increased provision of sheltered and extra care housing for older residents</li> <li>• increased provision of 1 and 2 bedroom flats for younger residents</li> <li>• commitment to a thorough assessment of the infrastructure needs of each community and active planning to meet those needs ahead of further development</li> </ul> <p>all future development to be subject to strict environmental and sustainability standards, including limiting traffic growth and enhancing road safety</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9333
<b>Full Name</b>	MR AND MRS EDWARD AND ANGELA STURMER

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>3) The need for affordable housing is extreme <b>but more for rentable property</b> than purchasable. <b>Therefore the figure for Housing Association / DBC housing for rent should be as high as possible.</b></p> <p>4) As we keep reading, <b>the ability of building companies to renege on the planned figure for affordable housing is scurrilous and our plan should prevent that.</b></p>
Include files	
Number	Question 17
ID	LPIO9502
Full Name	Duncan Eggar
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>HOUSING.</b> The vagueness of information regarding the provision of housing types (all I recollect is xx% affordable) doesn't help the giving of constructive comment. The mix and how it is able to evolve in the future will have a profound effect on the infrastructure requirements and the community that develops. I got a very woolly response to exactly what 'affordable housing' means. On a personal level I would seek a mix of housing that includes long term provision of affordable rental stock; this probably requires the involvement of a Housing Association or the like</p>
Include files	
Number	Question 17
ID	LPIO9520
Full Name	Patricia Bandle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

<b>Your response - Please add your response here</b>	5. More AFFORDABLE homes are needed to help locally people find places to live. Very few have been built in Berkhamsted and we need more. We do not need more expensive housing which makes money for developers and incidentally for the council and pushes prices up making housing even more Inaccessible to many.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9542
<b>Full Name</b>	Adrian miller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Finally please ensure 35% affordable housing in Berkhamsted as opposed to accepting capital payments in lieu
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9583
<b>Full Name</b>	Ms Claire Samson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	As a local resident of Berkhamsted I am writing to give my views on the housing consultation on the Local Plan. I am not in support of the local Plan and the options that are proposed. It will build on the limited green belt and fails to show how the council is going to deliver affordable housing or address the severe lack of investment in supporting infrastructure. Services and facilities in Dacorum are already under chronic pressure ; things like roads, parking, playgrounds, schools, health services, sewers, water and utilities. I think that green belt should be left for the purpose for which it was intended. The housing proposed is likely to mean that speculators make vast profits from expensive homes rather than providing a significant amount of affordable housing including social housing. Local people, particularly young people, as well as carers, teachers and NHS staff we rely on to help the community cannot afford to buy or rent locally as we are very short of suitable and affordable supported housing. The council need to think of the impact that recent housing developments have already had on the community,



	traffic, air pollution and road safety etc before they plan even more building developments.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9608
<b>Full Name</b>	Mr Guy Dawkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	If we are to have homes they should be affordable, or better still, social to accommodate the teachers, carers, nurses and other essential professionals who can no longer afford even to rent locally. It seems that developers have been known to undertake to provide a proportion of 'affordable' homes, but once they have the contract signed find all manner of reasons to explain why they cannot actually deliver quite what they promised. The same thing may be said for environmental improvements, play areas or, sometime, even pavements.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9680
<b>Full Name</b>	Mr Luke Geoghegan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	There is inadequate consideration of affordable and social housing
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9691
<b>Full Name</b>	Christine Riefa
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	<p>The draft Dacorum Local Plan fails to show:</p> <ul style="list-style-type: none"> <li>• how to meet the desperate need for more affordable and social housing for the teachers, NHS staff and carers who serve this community;</li> <li>• how to ease the pressure on this part of Dacorum's creaking infrastructure (public transport, cycling and walking, roads, parking, schools and playgrounds, GPs, drains, water and utilities) from recent housing developments, let alone the demands of further housing development;</li> <li>• how further housing development is consistent with the stated aim to protect and enhance what local people love about where we live;</li> <li>• how the community can be guaranteed that new housing will be developed sustainably meeting the highest environmental standards; or</li> </ul> <p>how development will avoid associated traffic worsening air pollution and road safety in Berkhamsted, Northchurch and Tring.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP109696
<b>Full Name</b>	Christine Riefa
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I think your plan needs to be rejected. It is not acceptable to sacrifice green belt land. A new draft Plan which is genuinely designed to meet the needs of this community should be presented, in particular, I would encourage:</p> <ul style="list-style-type: none"> <li>• green belt land is only allocated for development where guaranteed more than genuinely affordable housing (and at least of that to be social housing)</li> <li>• increased provision of sheltered and extra care housing for older residents</li> <li>• increased provision of 1 and 2 bedroom flats for younger residents</li> <li>• commitment to a thorough assessment of the infrastructure needs of each community and active planning to meet those needs ahead of further development</li> </ul> <p>all future development to be subject to strict environmental and sustainability standards, including limiting traffic growth and enhancing road safety</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP109732
<b>Full Name</b>	Brendon Sparks
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Affordable Houses</u>  Previous plans passed to include affordable houses in Berkhamsted have failed. Builders /developers have paid lip service to this, and paid the Council so that they can build more expensive houses instead - and make bigger profits! This has been a mockery of what the Council proposed. The new plans for affordable housing in Berkhamsted, based on actual DBC past acceptance of "buy-off's", will equally fail to provide affordable housing.</p>
Include files	
Number	Question 17
ID	LPIO9762
Full Name	Aly MacLean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will</li> </ul>

	<p>be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</p> <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9810
<b>Full Name</b>	Mr Paul Wardle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p><b>Affordability:</b></p> <ol style="list-style-type: none"> <li>Most, if not all of the land parcels mentioned on the consultation are areas next to mainly detached houses. So I would hope that any new developments should be building houses of a similar stature/style, in keeping with those around. In which case those houses will not be affordable. <ol style="list-style-type: none"> <li>A quick search of Rightmove shows 2 bedroom properties in the region of £200K - £700K, 3-4 bedroom £470K to over £1million.</li> <li>Even the current building work at Bearroc Park lists houses from £580K - £895K.</li> <li>Not affordable to most people.</li> </ol> </li> <li>Berkhamsted is one of the most expensive places outside of London to live. Additional housing will just attract people from London to move to the area, since they are the only ones that can afford it and therefore this will push house prices up. Not make them more affordable.</li> <li>Even if developers promise to build "affordable" homes all that will happen once they have planning permission is that they will claim that the site is not economically viable to support the level of affordable homes promised</li> </ol>

	<p>and will look to change their commitments so that they can make more profit.</p> <p>4. People buying the “affordable” homes will look to sell them as soon as they can, at market rates not at affordable rates.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be ‘bought out’ by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the ‘viability argument’. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a ‘market housing’ level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO9883
<b>Full Name</b>	Mrs E Mothersole
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am in favour of building more homes in Tring as young people who want to live in the area need choice and affordable homes.</p> <p>Back in 1982 when we moved into a cluster house in Hunters Close they were very much an affordable option for young people.</p> <p>Tring has changed dramatically since then house prices have soared there is no longer any affordable housing.</p> <p>Could you clarify what you mean when you say 'affordable' housing and how can you guarantee that the percentage stays at 40% and is non-negotiable as in lowering this percentage to suit developers.</p>
<b>Include files</b>	

Number	Question 17
ID	LPIO9889
Full Name	Prof DAVID COLQUHOUN
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It is essential that all these developments should include a proper amount of social housing, The tricks used by developers to avoid this requirement have been well -documented, and the Council must not allow itself to be tricked by them.
Include files	
Number	Question 17
ID	LPIO9912
Full Name	Jason Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<b>Affordable Housing</b> – The plans state 40% of the dwellings will be affordable housing. Can you confirm if this is shared ownership to help people onto the property ladder or social housing?
Include files	
Number	Question 17
ID	LPIO9930
Full Name	Bryan Smart
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Affordable houses which are needed are not being built in Berkhamsted because of the process whereby developers pay to avoid building them
Include files	
Number	Question 17
ID	LPIO9985

Full Name	mr Kevin Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
Include files	
Number	Question 17
ID	LPIO10033
Full Name	Jill Mewha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10102
<b>Full Name</b>	Melanie Frankel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p>



	<p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10150
<b>Full Name</b>	Natalie Crane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p>

	<p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP1010207
<b>Full Name</b>	Mr Tim Beeby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default</li> </ul>

	<p>position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10254
<b>Full Name</b>	John and Jane Beeley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long</li> </ul>

	<p>term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10304
<b>Full Name</b>	Kathleen Lally
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing in response to the latest plan for housing development in Berkhamsted, most of which suggests an excessive and impractical number of new houses. I have read your Local Plan 2017 and I have read the reply of Berkhamsted Residents' Action Group (BRAG) and agree that <u>Option 1B is the only option acceptable</u>.</p> <p>I agree entirely with the BRAG response to your plan.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</li> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10352
<b>Full Name</b>	J&P Savage
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Secondly, the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10418
<b>Full Name</b>	Mr Daniel Parry

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
Include files	
Number	Question 17
ID	LP1010467
Full Name	David Burbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, <b><u>I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</u></b></p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</b></p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
Include files	
Number	Question 17
ID	LPIO10517
Full Name	Mr Stephen Doughty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as</p>

	<p>confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>I would however like to make a few specific comments.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10565
<b>Full Name</b>	Mr Roger Petts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>...</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on</li> </ul>



	<p>the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10612
<b>Full Name</b>	Simon Chilton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does</li> </ul>

	<p>not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10662
<b>Full Name</b>	Sally and David Williams
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please register as support for BRAG's submission.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10710
<b>Full Name</b>	Mrs Jenny Jenkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10755
<b>Full Name</b>	Taylor Wimpy Strategic Land
<b>Company / Organisation</b>	Taylor Wimpy Strategic Land
<b>Position</b>	C/O Pegasus Group
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We generally agree with the proposed approach to affordable housing.</p> <p>There is an acute need to deliver additional affordable housing in Dacorum. With unaffordable open-market</p>

	<p>housing and a waiting list of 10,240 households[1] for affordable housing in 2016, it is clear that the delivery of affordable housing should be given significant weight in deciding how many homes to plan for. Indeed, it is noteworthy that the waiting list in Dacorum is amongst the largest of <i>any</i> local authority outside of major conurbations and large unitary authorities.</p> <p>It is noted that greenfield housing sites will be required to provide 40% affordable housing, rather than the standard 35%. It is important that the viability of this approach is robustly tested to ensure that such a level is actually achievable without preventing sites from coming forward for development.</p> <p>For full response please see question 46.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10803
<b>Full Name</b>	Grant Imlah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Moreover i am aware that The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will</li> </ul>

	<p>be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10856
<b>Full Name</b>	Sheila Dawkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have studied the above plan, accessed the BRAG website, and attended the Berkhamsted Citizens Association Visioning Evening on 15 November and the Berkhamsted Town Council presentation on 22 November.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does</li> </ul>

	<p>not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10904
<b>Full Name</b>	Jean Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO10953
<b>Full Name</b>	Christopher Stafford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p>

	<ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11004
<b>Full Name</b>	Mrs Patti Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one</li> </ul>

	<p>of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11050
<b>Full Name</b>	J M Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11098
<b>Full Name</b>	Denis Maclure
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Developers must be made to build the affordable homes DBC calls for, not allowed to buy themselves out.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11131
<b>Full Name</b>	Cally Emmas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11178
<b>Full Name</b>	Mr Neil Aitchison
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	If DBC are going into building affordable some sites could be wholly affordable and not others. Affordable housing should only be built in areas close to schools, employment and transport links.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11225
<b>Full Name</b>	Jon Rollit
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.

	<p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11275
<b>Full Name</b>	Kate Locke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>In addition I would reiterate the extensive points made in the BRAG response to the 'Issues &amp; Options' consultation. I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. The Berkhamsted Residents Action Group (BRAG) has responded in full.</p> <p>In addition, I like to take this opportunity emphasize just a few of the most important points within that response.</p>

	<p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11363
<b>Full Name</b>	Ms Lorraine Gilmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>BRAG has responded in full to the 'Issues &amp; Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish Dacorum Borough Council (DBC) to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasise some of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p>

	<p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11412
<b>Full Name</b>	Conian
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.</p> <p>YES</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation. I would be happier if the plans were to build <b>truly affordable</b> housing ie social housing</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p>

	<p><i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11451
<b>Full Name</b>	Mr & Mrs J Neale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>No, because the definition of an affordable rent as 80% of the local rent is arbitrary and divisive. It is the Government's definition (National Planning Policy Framework – March 2012) and therefore imposed from above, but DBC could set targets for social housing, or have a local "affordable rent" based on local median income.</p> <p>Even when developers have promised to build a certain proportion of affordable housing, they are able to avoid keeping to the obligation by invoking Section 106 of the affordable housing requirements (<a href="http://www.bbc.co.uk/news/uk-40643072">http://www.bbc.co.uk/news/uk-40643072</a>). How will DBC ensure that what is promised will be delivered?</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11522
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>but...</b></p> <p>I don't think the consultation proposal goes far enough. At a meeting on 22 November 2017 hosted by Berkhamsted Town Council it was stated that Dacorum's waiting list for social housing is well over 5,000 people (qualified and approved for social housing). Given this, I believe that a minimum of 40% of all dwelling units on sites of 5 or more units should be affordable. In other words, the 40% figure should be a minimum threshold, not a target. And this threshold should be applied to smaller sites, those of 5 or more units, not just those with 11 or more units. Finally, Dacorum <i>must</i> enforce this and not allow any means of bypassing or avoiding delivering below the threshold 40% level.</p>
Include files	
Number	Question 17
ID	LPIO11601
Full Name	Janet and James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default</li> </ul>

	<p>position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11648
<b>Full Name</b>	john and barbara neale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>No, because the definition of an affordable rent as 80% of the local rent is arbitrary and divisive. It is the Government's definition (National Planning Policy Framework – March 2012) and therefore imposed from above, but DBC could set targets for social housing, or have a local "affordable rent" based on local median income.</p> <p>Even when developers have promised to build a certain proportion of affordable housing, they are able to avoid keeping to the obligation by invoking Section 106 of the affordable housing requirements (<a href="http://www.bbc.co.uk/news/uk-40643072">http://www.bbc.co.uk/news/uk-40643072</a>). How will DBC ensure that what is promised will be delivered?</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11717
<b>Full Name</b>	kevin minier
<b>Company / Organisation</b>	Dacorum Patients Group
<b>Position</b>	chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

Your response - Please add your response here	1 Housing – the Local Plan must ensure that our housing provision meets the needs of all our residents and encourages people from all walks of life to live in Dacorum – we need a 24/7 workforce. Housing solutions must be affordable with the Local Plan supporting the infirm, the unemployed, homeless, manual workers as well as professionals.
Include files	
Number	Question 17
ID	LPIO11756
Full Name	Edmund Hobley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough’s policy. They must not be allowed to ‘buy out’ their obligation.</p> <p><b>Brag Response to question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be ‘bought out’ by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the ‘viability argument’. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a ‘market housing’ level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with</li> </ul> </li> </ul>



	easy low-cost access to public transport, employment, retail, education, health etc
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11795
<b>Full Name</b>	Rodney O'Callaghan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>4, Affordability,</b></p> <p>The cost of housing in Dacorum is high (as defined by multiples of average salary) and there is a need for affordable housing . However your representative at the consultation indicated that the definition of “affordable” is where a</p> <p>developer will offer a 10% discount given that most of the property in TR-H1 is very convient to the station many of the properties will be similar to other properties on this road which are £1000000 to £1500000 even a 10% discount</p> <p>will not make them affordable.</p> <p>In addition I gather that developers can “pay” the council to avoid this requirement.</p> <p>It seems probable that most of the population increase will come from London Commuters rather than Dacorum residents .</p> <p>Finally may I state that I am not a NIMBY we need more houses in Tring and we need affordable homes . The current proposals are too extreme in terms of scale and make no concrete proposals on affordability . I therefore register my strong objections.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11800
<b>Full Name</b>	Rodney O'Callaghan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Finally may I state that I am not a NIMBY we need more houses in Tring and we need affordable homes . The current proposals are too extreme in terms of scale and</p>

	make no concrete proposals on affordability . I therefore register my strong objections.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11862
<b>Full Name</b>	Councillor Alan Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Allowing developers to restrict the amount of smaller houses on the open market, the literal meaning of 'Affordable Housing', would make local housing less affordable not more.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO11906
<b>Full Name</b>	Janet Mason
<b>Company / Organisation</b>	Berkhamsted Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc as the site to which it relates.</p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard.</p>
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO11953
<b>Full Name</b>	Dee Sells
<b>Company / Organisation</b>	Markyate Parish Council
<b>Position</b>	Parish Clerk/ RFO
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Yes</b></p> <p><i>It is essential to provide affordable housing in rural areas to meet local needs only. Clearly developers want to make their money and will not want to provide too many affordable homes, but the new occupants of their developments will still expect the local services provided by those who need the affordable homes! Building for commuters needs to be close to a transport hub and does not need to include affordable houses, but elsewhere there needs to be more affordable housing for those who work locally on lower incomes.</i></p>
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO11987
<b>Full Name</b>	Mark Behrendt
<b>Company / Organisation</b>	Home Builders Federation
<b>Position</b>	Planning Manager – Local Plans
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Affordable housing</p> <p>Any policy on affordable housing must be prepared on the basis of the cumulative impact of the policies in the plan on the viability of new development. This will need to include the impact of policies relating to issue such as internal space standards, accessible homes and open space provision as well as the infrastructure requirements set out in the plan. It is also important that any policy is flexible to ensure that where sites are made unviable by the affordable housing requirements the Council will look to reduce or remove the requirements set out in the policy.</p>
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO12027
<b>Full Name</b>	ROB RIGBY
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The development of greenbelt land is not the answer to the overall housing shortage. If any government were to actually look at the issue they may want to change the rules on buy to let ownerships which has taken away any opportunity for young people to purchase affordable homes as first time and even second time buyers. I have no doubt that the proposed houses would cost in excess of half a million which means it will do nothing to help the actual shortage issue and only provides an opportunity to extend the provision for social housing. Again on a national level, if the selling of social homes were to stop, there wouldn't be such a shortage.
Include files	
Number	Question 17
ID	LPIO12053
Full Name	David Wilyman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>Standard BRAG response to Question 17. Please note full document is attached to Question 46</p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long</li> </ul>

	<p>term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12104
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>We believe there is a substantial demand for affordable homes, with around 6000 people on the Council house waiting list. Building these smaller units within the towns would ensure that they are easily accessible by sustainable modes of transport whilst also making good use of brownfield land. By putting developments in the towns, more of the housing need could be met without having to encroach on the Green Belt or the AONB.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12145
<b>Full Name</b>	Ray Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<p><b>Your response - Please add your response here</b></p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Standard BRAG response to Question 17. Please note full document is attached to Q46.</p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 17</p>
<p><b>ID</b></p>	<p>LPIO12209</p>
<p><b>Full Name</b></p>	<p>Douglas &amp; Christina Billington</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>Yes</p>
<p><b>Your response - Please add your response here</b></p>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>Q30. Social Infrastructure. Unrealistic assumptions.</p>

	<p>Reliant on other providers. Mental health and culture ignored.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12288
<b>Full Name</b>	Richard Frankel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>Standard BRAG response to Question 17. Please note full document is attached to Question 46.</p>

	<p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP1012349
<b>Full Name</b>	Mr Brian Kazer
<b>Company / Organisation</b>	Tring in Transition
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>No.</b> We support para 6.3.11 for privately owned land. However, for publicly owned land, e.g. site Tr-h5, we recommend a 50% mix of affordable housing and starter homes (which are out-with Govt definition of affordable homes) on the grounds that public assets should be used to deliver development outcomes that are most needed by the public, and to deliver homes affordable by essential workers (often paid below the national average wage of £27k)</p> <p>The absence of any proposal to build "Starter Homes" affordable for first-time buyers on average earnings ((£27k x 4) + 10% deposit) is of serious concern. The absence of "Starter Homes" from Govt definition of affordable homes does not mean they cannot be promoted in the Plan especially on local authority-owned land.</p> <p>What does Affordable Rent mean in practical terms to a renter? For example, in the Tring market rent for a basic 3 bed house is £1,500 per month = £18,000 per year. 80% of this (for "affordable" rent) would be</p>



	<p>£14,400. This is over 50% of average gross earnings (of £27k). For a newly qualified teacher (£23k pa gross), 80% is £18,400 pa rent. <b>Affordable Rent homes linked to no more than 80% of market rent would be more realistically affordable at a rent nearer to social rent levels.</b></p> <p>We support DBC “New Build Programme” being used for social rent housing as well as Starter Homes.</p> <p><b>Downsizing by older people not addressed.</b> Currently the lack of good quality smaller houses is blocking release of family homes onto the market. We would recommend that an upward movement in % of good quality 2 bedroom open market homes be considered to address this issue.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12394
<b>Full Name</b>	ms rona morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	DBC seem to taking the highest proportion in the SHMA analysis and adding to it. It is not clear how this housing will be positioned within the area to ensure that the character of the local towns and villages.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12432
<b>Full Name</b>	Judy Halden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

	<p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>Standard BRAG response to Question 17. Please note full document is attached to Question 46.</p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12480
<b>Full Name</b>	Meenakshi Jefferys
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p>

	<ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12527
<b>Full Name</b>	Mrs Jane Barrett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>Standard BRAG response for Question 17. Please note full document is attached to Question 46.</p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'.</li> </ul>

	<p>Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12576
<b>Full Name</b>	mr paul healy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</li> </ul>

	<ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12626
<b>Full Name</b>	Merrick Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasise just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'commute/buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	

Number	Question 17
ID	LPIO12675
Full Name	Monika & Casper Gibilaro
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under our name</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
Include files	
Number	Question 17
ID	LPIO12723
Full Name	Lorna Ginn
Company / Organisation	
Position	
Agent Name	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP1012772
<b>Full Name</b>	Mr Raymond Phipps
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</b>

	<p>...</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12819
<b>Full Name</b>	Ingrid Carola McKenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p>



	<ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12867
<b>Full Name</b>	Mr Stephen Lally
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</b></p> <p>...</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely</li> </ul>

	<p>reduces the gain from the award of a planning consent.</p> <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12921
<b>Full Name</b>	Jon Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO12970
<b>Full Name</b>	Edward Keane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13019
<b>Full Name</b>	Bettina Deuse
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to question 17 below (full BRAG response see question 46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13072
<b>Full Name</b>	Mr Paul Tinworth
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<p>Your response - Please add your response here</p>	<p>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</p> <p>...</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 17</p>
<p><b>ID</b></p>	<p>LPIO13120</p>
<p><b>Full Name</b></p>	<p>Hilary Dann</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>Yes</p>
<p>Your response - Please add your response here</p>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p>

	<p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13156
<b>Full Name</b>	Ms Anne Duvall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Meanwhile any house / flat, new or old, that comes on to the market seems to be acquired by monied people who then put up 'To Let' signs, the rents being of eye-watering proportions. Pilkington Manor for instance, opposite the Rex Cinema, has 12 flats only 3 of which are owner/occupied. there's a plethora of letting agents in the town, and Nash Estate agents, for one, advertises in the Rex Cinema that they are selling in London to bring commuters with mega bucks to Berkhamsted.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13164
<b>Full Name</b>	Mr J P Goodings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13186
<b>Full Name</b>	Mr J G Botha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	You work hard to buy a nice house in a nice area like Kings Langley and then your neighbour gets a house at a knock down price. Any affordable housing percentages should be lowered not increased.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13203
<b>Full Name</b>	P Baye
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	We do not need more Council houses and these maybe built on brownfield sites.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13220
<b>Full Name</b>	Mrs Suzanne Gray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Needs a balance of differing house styles and sizes mixed in each area.

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13264
<b>Full Name</b>	D. Phillips
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I fully concur with the comments attached from BRAG. The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13287



<b>Full Name</b>	Mr Peter Watts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I cannot see how you will resolve the major problem of providing housing for our youth which i regard as important, by building houses in Kings Langley as they will remain outside their pockets in the foreseeable future, whatever you choose to build.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13308
<b>Full Name</b>	Mrs Diana Calderwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Affordable sustainable housing will not result from these proposed Green Belt areas being built on, all on the valley top.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13332
<b>Full Name</b>	Janet Fanshawe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	We do realise that many local people would like to buy (or even rent) houses in the area and note the Council's intention that 40% of new housing should be affordable. However, affordable in the context of Kings Langley house prices would exclude most of the young families in need of housing - even if the developer did not renege on the deal.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13337

<b>Full Name</b>	Mr Keith Fanshawe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	We do realise that many local people would like to buy (or even rent) houses in the area and note the Council's intention that 40% of new housing should be affordable. However, affordable in the context of Kings Langley house prices would exclude most of the young families in need of housing - even if the developer did not renege on the deal.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13380
<b>Full Name</b>	Mrs Christine Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Housing is not affordable for young people to buy
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13381
<b>Full Name</b>	Mr Alan Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Housing is not affordable for young people to buy
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13454
<b>Full Name</b>	Mrs Catherine Imber
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13502
<b>Full Name</b>	Deborah Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the

	<p>extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13557
<b>Full Name</b>	Mr Alan O'Neill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p>

	<p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13610
<b>Full Name</b>	Sue O'Neill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default</li> </ul>

	<p>position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13655
<b>Full Name</b>	Moira and David Lea
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Homes should not just be multi million pound homes that make the developers rich and leave the town poorly serviced for facilities. Homes should also be for younger people as a vision for the future.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13672
<b>Full Name</b>	Tim Uden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

	<p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13737
<b>Full Name</b>	Edward Hatley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p>

	<p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP1013787
<b>Full Name</b>	Mr Roger Didham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one</li> </ul>



	<p>of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13842
<b>Full Name</b>	Alex Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does</li> </ul>

	<p>not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13914
<b>Full Name</b>	Mr Chris Stoneman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	In addition there was comments about Affordable Homes in the proposed Developments but this figure of 40% according to research is rarely met through the country. Would you confirm that plans are in place that it would be <u>strictly</u> met and failure would mean a rejection by the Council. Dacorum does need more affordable homes including Tring to encourage younger people to be able to purchase houses.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO13979
<b>Full Name</b>	Sheila Newland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I understand the need for more affordable homes but these must be built in areas where there is access to employment and public transport.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14012
<b>Full Name</b>	Danny Jennings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum's Local Plan.</p> <p>...</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
Include files	
Number	Question 17
ID	LPIO14061
Full Name	Mr John Goffey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response to the DBC <i>Issues and Options</i> document. We would, in addition, like to add the following points concerning Question 33 of the above document.</b></p> <p>...</p>

	<p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent. <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14109
<b>Full Name</b>	Sue Elleray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p>

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<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14160
<b>Full Name</b>	Mr Richard White
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</b></p> <p>...</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely</li> </ul>

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<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14302
<b>Full Name</b>	Ms Vicky Tattle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO14341
<b>Full Name</b>	Mrs J M Sparks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Builders/developers have paid lip service to any previous plans for affordable housing, and paid the council so that they can build more expensive houses instead – and make even bigger profits! This has been a mockery of what the Council proposed. The new plans for affordable housing in Berkhamsted, based on actual DBC past acceptance of “buy-off’s”, will equally fail to provide affordable housing.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14348
<b>Full Name</b>	Ms Alison Cockerill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The recently built council houses were very welcome and more are needed, social housing not ‘affordable homes’ that start at £5000,000 as a sup to the even more expensive properties around them.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14390
<b>Full Name</b>	Ray Tattle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.

	<p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14438
<b>Full Name</b>	Giselle Okin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p>



	<p><b>Question 17</b> Do you agree with the proposed approach to affordable housing?</p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14487
<b>Full Name</b>	Mr David Griffin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</i></p> <p><i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i></p> <p><i>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</i></p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> Do you agree with the proposed approach to affordable housing?</p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which</li> </ul>

	<p>unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14640
<b>Full Name</b>	Mr A. Miles
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	We need to look very carefully into these developments - what type of houses are proposed high end expensive or affordable smaller units so single older residents of Kings Langley could downsize without moving out of the village.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14669
<b>Full Name</b>	Ann Bunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I also question that these developments would provide adequate affordable homes for local people who cannot afford to purchase a home. I am not opposed to providing homes for our future generations, i.e. local children from current parents. IT has to be the right kind, affordable social rent (not private landlords) BUT where possible on Smaller Plots of Lands or Brownfield Sites.

	I do feel quite strongly, that the people who would benefit from these large schemes are the LANDOWNERS AND DEVELOPERS who will only satisfy their bank balances and INCOME/INVESTERS who could afford the high prices of local homes.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14683
<b>Full Name</b>	Ann Bunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	1 keep in mind local needs, local housing with affordable rents 2 affordable to buy to a few isn't good
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14736
<b>Full Name</b>	R.W. Parsons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	the areas Be-h3 and Be-h7 should be used to build public housing for rent at sensible rates such that young people may have a home of their own.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14764
<b>Full Name</b>	Ms Paula Farnham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues &amp; Options' consultation. I could make similar</b>

**comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.**

However, I would like to take this opportunity to emphasize just a few of the most important points within that response.

Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.

**BRAG response to Question 17 (please note full document is attached to Q46)**

**Question 17** *Do you agree with the proposed approach to affordable housing?*

- Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.
  - Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14808
<b>Full Name</b>	Steve Baker
<b>Company / Organisation</b>	CPRE - The Hertfordshire Society
<b>Position</b>	Planning Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	In paragraph 6.3.10 of the Issues and Options document it states that increasing the overall supply of new housing will help boost the supply of affordable homes. The higher provision of 40% affordable housing on large greenfield sites seems to conflict with the supposition in paragraph 6.3.5 that brownfield sites are more likely to provide smaller sized homes which are the size predominantly required for affordable homes.

	<p>Boosting affordable housing by increasing the overall supply of housing is a largely ineffective in meeting need. The national 'housing crisis' is not a simple 'numbers' problem but a problem of ensuring existing and new housing is provided for those households who need them rather than just those who can afford them in an open housing market. New housing developments in Dacorum will be acquired in a very competitive market for an investment or second home as well as homes to live in. This competitive market reduces the likelihood of those who really need the new homes being able to afford them. We refer you to Ian Mulheirn's articles on housing prices and whether building more houses will bring house prices down Part 2 Are housing costs high? <a href="https://medium.com/@ianmulheirn/part-2-are-housing-costs-high-6ace5706d7">https://medium.com/@ianmulheirn/part-2-are-housing-costs-high-6ace5706d7</a> and Part 3 Why are prices so high and will building more bring them down? <a href="https://medium.com/@ianmulheirn/part-3-why-are-prices-so-high-and-will-building-more-bring-them-down-9126e272">https://medium.com/@ianmulheirn/part-3-why-are-prices-so-high-and-will-building-more-bring-them-down-9126e272</a> These articles illuminate the national housing shortage and its relevance to areas of high housing demand such as London and the south east of England.</p> <p>Measures to encourage and promote the direct provision of social and affordable housing should be pursued, rather than simply relying on a small percentage of dwellings in large developments. The Council's own house-building programme is one such method but other direct provision including community housing should be supported.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14835
<b>Full Name</b>	Bev Mckenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>In addition, I draw attention to some of the most important points within that response</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p>

	<p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO14882
<b>Full Name</b>	Mr Michael Curry
<b>Company / Organisation</b>	Tring Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Town Council welcomes the emphasis being placed on the provision of affordable housing. There is a desperate need for housing that is within the reach of young families. The Town Council is hopeful that it will shortly be able to make a small contribution to increasing provision in locally.</p> <p>There is concern that a blanket application of the proportions suggested in paragraph 6.3.8 across the Borough should be avoided as this would not reflect local need.</p> <p>Further work needs to be done to ensure that when considering specific developments the affordable housing schemes put forward are appropriate to the local area. The priorities in provision are social rented and shared-ownership schemes.</p> <p>Consideration should also be given to 'starter homes' when opportunities present themselves.</p>
<b>Include files</b>	

Number	Question 17
ID	LPIO14938
Full Name	Malcolm and Jill Allen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation. <b>We must provide affordable homes to the children of current residents at an affordable price.</b></p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
Include files	
Number	Question 17
ID	LPIO14987

Full Name	Mr Clive Freestone
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
Include files	
Number	Question 17
ID	LPIO15037
Full Name	Mr & Mrs D A Simmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	



<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation.</p> <p>We request you accept this summary as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>We would like to take this opportunity to emphasize a few of the most important points within that response, <b><i>in particular our response to Q25.</i></b></p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15080
<b>Full Name</b>	Tom Simmons
<b>Company / Organisation</b>	St William Homes LLP
<b>Position</b>	Development Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>St William support DBC's aspiration to deliver 35% affordable housing on all sites of more than 11 dwellings subject to viability (question 17). It is important that any affordable housing requirement is subject to viability to ensure accordance with paragraph 173 of the NNPF which states:</p>

	<p><i>“To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”</i></p> <p>This is especially true given the finite supply of remaining brownfield sites in DBC and the desire to protect the Green Belt. Brownfield sites can be very complex and costly to redevelop and this should be considered in assessing viability and determining an appropriate level of affordable housing. In particular, former Gasworks sites are unique in both use and character and have extremely high abnormal and technical costs, such as remediation, associated with development.</p> <p>It is also considered that affordable housing policy should also allow for size and tenure mix to be determined on a site-by-site basis having regard to the characteristics and location of the site and proposed development. As such, the percentage targets detailed at paragraphs 6.3.2 and 6.3.8 should not be taken forward in the New Local Plan.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15169
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I understand that some increase in housing in Tring is required, but that the ‘affordable’ housing should be TRULY affordable. I have lived in Tring for 30 years now, having been a first time buyer here back in 1988, and with numerous friends who were also first time buyers back in the 1980’s.. At that time a house costing three times my salary was only just affordable. We need to continue to have a town where it is possible for young people (including our growing children) to start off. There are numerous ‘executive’ homes on large plots already. Therefore a significant amount of the development should be geared towards local people on lower incomes and the young. Anything which encourages land or property speculation or buy-to-let should be strongly discouraged.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15171

<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Dacorum Borough Council should keep very closely abreast of the latest rules coming out from Central Government, which is likely to put more emphasis on affordable housing, energy efficiency etc, so that we get the best moral outcome for any development in Tring, and we do not provide more housing than is truly required, or housing with a high profit margin to suit developers.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15178
<b>Full Name</b>	Bert Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.  There is no evidence of the need for affordable housing – in Dacorum the 35% target appears to be based purely on guesswork and to raise this to 40% for greenfield sites is illogical. It is unclear why people need to live locally. Historically it has always been necessary for many first time buyers to purchase in lower cost areas in order to join the housing ladder. There is a much greater abundance of affordable housing in high growth towns further from London but remaining within relatively easy commuting distance of Dacorum – such as Aylesbury and Milton Keynes. Unfortunately in desirable areas the price of even small properties are unaffordable for many.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15198
<b>Full Name</b>	Valerie Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>There is no evidence of the need for affordable housing – in Dacorum the 35% target appears to be based purely on guesswork and to raise this to 40% for greenfield sites is illogical. It is unclear why people need to live locally. Historically it has always been necessary for many first time buyers to purchase in lower cost areas in order to join the housing ladder. There is a much greater abundance of affordable housing in high growth towns further from London but remaining within relatively easy commuting distance of Dacorum – such as Aylesbury and Milton Keynes. Unfortunately in desirable areas the price of even small properties are unaffordable for many.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15264
<b>Full Name</b>	Caroline Manson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17: Do you agree with the proposed approach to affordable housing?</b></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default</li> </ul>

	<p>position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15316
<b>Full Name</b>	Mr Alan Conway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues &amp; Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q17 It is most desirable that developers should not be able to renege on their obligations in respect of social housing but I accept that this may be difficult for one local authority to enforce and surely needs a concerted approach by either local or central government.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does</li> </ul>

	<p>not make a development unviable it merely reduces the gain from the award of a planning consent</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP1015365
<b>Full Name</b>	Sue Wolstenholme
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p><b>Standard BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</li> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17

<b>ID</b>	LPIO15408
<b>Full Name</b>	Paul de Hoest
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>1 The consultation refers to the requirement of 40% of new build being 'affordable'. The official definition of affordable is 20% below market rates (which in this area remains very unaffordable for many people). It is well recorded that developers typically submit plans to satisfy this criteria but once the build out occurs then these are provided in much lower proportions. As a community we should insist that these intentions are fulfilled. I also believe that there needs to be a substantial contribution of traditional social housing. Affordable/social homes tend to be of a higher density than what builders describe as luxury family homes and can be developed within the communities closer to the centres. To the extent that these are possible then this will create fewer additional strains on the transport infrastructure and be more likely to assist the promotion and development of local economies.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15427
<b>Full Name</b>	Nick Hanling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They</p>

	<p>must not be allowed to 'buy out' their obligation. To allow this would suggest that the Borough had no real intent to provide affordable homes for Dacorum residents.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15475
<b>Full Name</b>	Sarah and Nigel Tester
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p>



	<p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP1015531
<b>Full Name</b>	Miss Tanya Assarat
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long</li> </ul>

	<p>term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15580
<b>Full Name</b>	Melanie Llewellyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO15614
<b>Full Name</b>	M B Ridley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Govt recently concluded a consultation entitled "The right homes in the right place", but the right homes are for those people living in Dacorum in need of homes. There are currently 5600 households on DBC housing list (1) and including the B list thos number would be 11200 ("). The potential for developing on non-green belt housing sites in Dacorum ("identified housing capacity") is about 11000 houses, (2,4) meaning that very few homes need to be built on Green belt land.</p> <p>In order to address need, neither is it necessary to build non-affordable homes in the area to attract people from other areas.</p> <p>It is noted that the Borough is being required to build houses due to govt pressure. The housing crisis in London is partly due not to lack of houses, but pricesthat put them beyond the reach of most Londoners. Speculative rental investment by non-occupying owners, unoccupied houses owned by overseas investors, and a rental market dominated by easy access to buy to let mortgage, all contribute to inflated house prices and the housing crisis that we are currentky experiencing. It is not the role of Hemel Hempstead to pick up the tab for this situation.</p> <p>REFERENCES</p> <p>1 - The Gazette, November 8th 2017 page 2  2 - Information from a DBC / HCC councillor  3 - The I newspaper, Monday 23rd October  4 - DBC Local Plan November 2017 page 94</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15618
<b>Full Name</b>	Angela and Martyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	WE appreciate that houses are & will be needed in Dacorum. However the need seems to be for affordable

	& social housing. But "affordable" housing in Berkhamsted is unlikely to be affordable to those who really need it. And developers are unlikely to build social housing here when they can make so much more profit from larger more expensive properties, which attract house buyers out of London.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15647
<b>Full Name</b>	Mr James Honour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15706
<b>Full Name</b>	Mark Pawlett

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</b></p> <p>In particular I am concerned regarding the lack of strategic thinking that the DBC proposes in respect of town planning. It is my view that affordable housing is required, however it is critical that any development effectively considers ecosystem services and biodiversity provided by Green Belt space in the area. I am concerned that the wider societal issues regarding the loss of green space in general are not effectively being considered. Town planning in Tring at the moment seems to be ignoring that there are proven causal links between green space and mental health.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
Include files	
Number	Question 17
ID	LPIO15754
Full Name	Maria & Colin Sturges
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
Include files	
Number	Question 17
ID	LPIO15801
Full Name	David Kerrigan
Company / Organisation	
Position	
Agent Name	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p>Developers must be made to build the affordable homes DBC calls for, not allowed to buy themselves out.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15868
<b>Full Name</b>	D B Land and Planning
<b>Company / Organisation</b>	D B Land and Planning
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	DBLP have no further comments to offer on 35% affordable housing
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO15980

Full Name	Mr Robert Sellwood
Company / Organisation	The Crown Estate
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We agree that the SHMA should be the starting point in setting the affordable housing mix on sites. The proposals to seek a higher (40%) percentage of affordable housing on large sites needs to be the subject of careful viability testing since strategic sites are often expected to make significant contributions to wider social and physical infrastructure. The Crown Estate would be willing to provide assistance with this viability testing process.
Include files	
Number	Question 17
ID	LPIO16059
Full Name	Dave Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger</p>



	and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16113
<b>Full Name</b>	Helen and Aaron Talbot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17

<b>ID</b>	LPIO16172
<b>Full Name</b>	Stuart Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16229
<b>Full Name</b>	Stuart Mears
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

Your response - Please add your response here	<p>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</p> <p>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16290
<b>Full Name</b>	Kitty Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
Your response - Please add your response here	<p><b>please find the attached report written on mine and other residents request.</b></p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take</p>

	<p>place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16352
<b>Full Name</b>	Aaron Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I support GFRA responses see below.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers</p>

	are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16399
<b>Full Name</b>	Ruth and Stephen Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our name.</b></p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q 17. Developers must be forced to provide the number of affordable homes dictated by the Borough’s policy. They must not be allowed to ‘buy out’ their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be ‘bought out’ by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the ‘viability argument’. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a ‘market housing’ level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost</li> </ul>

	access to public transport, employment, retail, education, health etc
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16465
<b>Full Name</b>	Andrew Yeomans
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16541
<b>Full Name</b>	Ian Emmas

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Question 17</b>     <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <p>. Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</p> <p>. Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</p>
Include files	
Number	Question 17
ID	LPIO16612
Full Name	Mrs Joan Cowley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I agree we need some housing which is affordable for our young people + ask that this be done by pursuing the idea of using existing, brown-field sights.
Include files	
Number	Question 17

<b>ID</b>	LPIO16716
<b>Full Name</b>	Lynsey Hillman-Gamble
<b>Company / Organisation</b>	Central Bedfordshire Council
<b>Position</b>	Strategic Plan Partnership Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Issue 10 – CBC considers that the local plan should provide for a range of housing types and tenure to ensure the needs of the whole community are met. This should be identified through an appropriate SHMA in order to ensure it is robust and fully evidenced
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16746
<b>Full Name</b>	Martin Ephgrave
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The consultation document suggests that housing allocations should provide 40% affordable housing. This is not considered to be reasonable, as current adopted Local Plan Policy CS19 seeks that 35% of the new dwellings should be affordable. The provision of 35% affordable housing is justified at paragraph 14.32 which states that it is “realistic and achievable, when compared with past achievement, economic conditions and costs associated with new building”.</p> <p>In our view, allocated sites should be treated in exactly the same way as unallocated greenfield sites, which have a requirement for 35% affordable housing. The viability of unallocated green field sites will be the same as allocated sites, so there is no justification for seeking an uplift in the level of affordable housing.</p> <p>Notwithstanding the above, it is confirmed that the proposed housing allocation on land to the west of Hoo House, Little Gaddesden will be policy compliant in respect of affordable housing.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16776
<b>Full Name</b>	Ms Juliet Miller
<b>Company / Organisation</b>	
<b>Position</b>	



Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q.17 Affordable housing</p> <p>I would like to register my objection to the Single Local Plan and reject Dacorum's draft Local Plan and the Options proposed because it:</p> <p>completely fails to show how the council is going to deliver affordable housing</p> <p>I am not prepared to see green belt lost so that land speculators make vast profits from yet more £1 million homes – instead I would like to see a plan which is genuinely designed to meet the actual needs of this community.</p> <p>Green belt should only ever be allocated for development if <i>guaranteed</i> (if the developer claims they can't make profit then they must withdraw their application) that more than 50% will be genuinely affordable housing (ie less than a third of a million pounds) and at least half of that be social housing. Our own young people, as well as the carers, teachers and NHS staff our families depend on, can no longer afford to buy or even rent around here. We are very short of suitable and affordable supported housing for older people. Yet none of these needs are addressed by the draft plan.</p>
Include files	
Number	Question 17
ID	LPIO16786
Full Name	Katie Guest
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> <li>we need affordable homes to <u>rent</u>, of all sizes- not the sort of houses that will get built by developers eyeing the high sales prices in this area</li> </ul>
Include files	
Number	Question 17
ID	LPIO16824
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16866
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>1 I understand that some increase in housing in Tring is required but that the 'affordable' housing should be TRULY affordable. I have lived in Tring for 30 years now, having been a first time buyer here back in 1988 and with numerous friends who were also first time buyers back in the 1980's. At that time a house costing three times my salary was only just affordable. We need to continue to have a town where it is possible for young people (including our growing children) to start off. There</p>

	are numerous 'executive' homes on large plots already. Therefore a significant amount of the development should be geared towards local people on lower incomes and the young. Anything which encourages land or property speculation or buy-to let should be strongly discouraged.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16892
<b>Full Name</b>	Jan Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO16928
<b>Full Name</b>	Emma Parkes-McQueen
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Housing needs to be made more affordable and open to a wider range of buyer, as all I can see is that building an extensive number of houses in this town will simply line the pockets of the developers, who are greedily capitalising on the higher house prices this town brings, rather than building in more affordable towns where the prices are not out of reach to most people, homes that average people can afford.
Include files	
Number	Question 17
ID	LPIO16980
Full Name	Chris Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make</p>

	sure that the full contribution of housing supply in that instance is brought forward.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17037
<b>Full Name</b>	Jade Holmes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17094
<b>Full Name</b>	Grahame Senior
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17187
<b>Full Name</b>	Rachel Heath
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I would be delighted if some new homes were built for our young people to afford to rent or buy. The new estate at the bottom of my road was going to offer some but they are not evident. Can the council ensure any of the new developments would have affordable housing when they have to allow the developer's a 50% share? It seems to me the developers are never challenged to</p>

	follow plans properly and the council is taken for a ride.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17227
<b>Full Name</b>	Debbie Crooks Pam Moss
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17

<b>ID</b>	LPIO17284
<b>Full Name</b>	Margaret and Andrew Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</b></p> <p>6.Developers must be forced to provide affordable homes as dictated by the Borough's policy and must not be allowed to "buy out" their obligations .</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17341
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No



<p>Your response - Please add your response here</p>	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>1 Tring can and should take some additional, affordable housing but not at the numbers presently envisaged.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 17</p>
<p><b>ID</b></p>	<p>LPIO17393</p>
<p><b>Full Name</b></p>	<p>Lesley Brown</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>Yes</p>
<p>Your response - Please add your response here</p>	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 17 below (copy of full response attached to question 46)</p> <p><b><i>Do you agree with the proposed approach to affordable housing?</i></b></p>

	<p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc. as the site to which it relates.</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</li> </ul> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17448
<b>Full Name</b>	Sara Bell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p>

	<p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17507
<b>Full Name</b>	Emma Talbot
<b>Company / Organisation</b>	The Little Cloth Rabbit
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Please find attached a report (GFRA) about the proposed development of Tring.</b></p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make</p>

	sure that the full contribution of housing supply in that instance is brought forward. ...
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17555
<b>Full Name</b>	MR DAVID BROWN
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 17 below (copy of full response attached to question 46)</p> <p><b><i>Do you agree with the proposed approach to affordable housing?</i></b></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc. as the site to which it relates.</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</li> </ul> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17614
<b>Full Name</b>	Paul Hembury
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning &amp; Development details my concerns comprehensively.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17688
<b>Full Name</b>	Michael and Jill Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail</b></p>

	<p><b>our concerns, far more eloquently than we could do ourselves.</b></p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17737
<b>Full Name</b>	Diana Woodward
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express.</p> <p>My main concerns echo those made by BCA:</p> <p>the ease with which large developers can evade their responsibilities to provide affordable and diverse housing. Unlike Aylesbury Vale and Oxfordshire, I don't see much sign of Dacorum encouraging self builders by releasing serviced plots, as opposed to letting big housing developers do whatever they want by putting identikit pastiche executive homes on greenfield sites.</p> <p>BCA response to Question 17 below - full document attached to Question 46</p>

	<p><b>Do you agree with the proposed approach to affordable housing?</b></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc. as the site to which it relates</li> </ul> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17793
<b>Full Name</b>	John and Helen Osborne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p>

	<p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17851
<b>Full Name</b>	David and Jane Elsmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make</p>



	sure that the full contribution of housing supply in that instance is brought forward.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17909
<b>Full Name</b>	Dave Davies
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</b></p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO17965
<b>Full Name</b>	Mr Michael Burbidge
<b>Company / Organisation</b>	
<b>Position</b>	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Given the cost of housing in the SE of England affordable housing is likely to be flats which are not within the character of most of the area. The sites for these will have to carefully considered and are likely to be brownfield rather than greenfield.</p> <p>If this is truly a plan to accommodate the needs of the local population then it needs to offer the area's young people affordable housing for those with and without children. The population is aging so protected housing should be part of the plan.</p> <p>I suspect that the plan is really about people moving into the area. It does not mention the needs of an aging population although is mentioned almost as an afterthought in the sections preceding question 18.</p>
Include files	
Number	Question 17
ID	LPIO18018
Full Name	mr Richard Lambert
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMENT), my own views can be summarised in a handful of bullet point.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p>

	<p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LP1018089
<b>Full Name</b>	Mr Graham Bright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate</p>

	mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18146
<b>Full Name</b>	Peter and Cathy Davidson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18203
<b>Full Name</b>	Nicky and Dave Hulse
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18256
<b>Full Name</b>	Gail Skelton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.</p>

	<p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18316
<b>Full Name</b>	Terry and Jennifer Elliott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with</p>

	<p>regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18359
<b>Full Name</b>	Plato Property Investments LLP
<b>Company / Organisation</b>	Plato Property Investments LLP
<b>Position</b>	C/O Aitchison Rafferty
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>This Statement has been prepared to respond to the questions set out in the Issues and Options Consultation published by the Council in November 2017. It is submitted on behalf of Plato Property investments LLP in respect of a site located to the south east of the Mini dealership at London Road, Cow Roast HP23 5RE.</p> <p>This Statement should be read along with the Planning Statement attached at <b>Appendix 1 (see Q 46 for attachment)</b> which sets out the detailed planning case in support of the allocation of the site for housing in the emerging Local Plan.</p> <p>In summary, we consider that:</p> <p>The consultation document suggests that housing allocations should provide 40% affordable housing. This is not considered to be reasonable, as current adopted Local Plan Policy CS19 seeks that 35% of the new dwellings should be affordable. The provision of 35% affordable housing is justified at paragraph 14.32 which states that it is “realistic and achievable, when compared</p>

	<p>with past achievement, economic conditions and costs associated with new building”.</p> <p>In our view, allocated sites should be treated in exactly the same way as unallocated greenfield sites, which have a requirement for 35% affordable housing. The viability of unallocated green field sites will be the same as allocated sites, so there is no justification for seeking an uplift in the level of affordable housing.</p> <p>Notwithstanding the above, it is confirmed that the proposed housing allocation on land to the south east of the Mini Dealership, London Road, Cow Roast, will be policy compliant in respect of affordable housing.</p> <p>The Local Plan should also recognise that residential mooring provides an alternative and much needed affordable option for meeting housing need and a more thoughtful policy for provision of more mooring development is necessary.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18460
<b>Full Name</b>	Mrs Wendy Mclean
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Whilst it is accepted there is a need for 'affordable homes' regardless of which definition they come under the logic behind the placement of the homes is skewed. In 6.3.12 There is appears to be no certainty that homes provided in the villages will be allocated to local people thus helping to support the vitality of the villages is just words.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18484
<b>Full Name</b>	Melanie Llewellyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p>



	<ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18530
<b>Full Name</b>	Mrs Juliet Chodzko
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.</b></p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely</li> </ul>

	<p>reduces the gain from the award of a planning consent</p> <ul style="list-style-type: none"> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18577
<b>Full Name</b>	Captain Andrew Cassels
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</b></p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18623
<b>Full Name</b>	Lindy Weinreb
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Do you agree with the proposed approach to affordable housing?</b></p> <p><b>Yes</b></p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc. as the site to which it relates</p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
Include files	
Number	Question 17
ID	LPIO18670
Full Name	Hilary Abbott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p>

	<p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18716
<b>Full Name</b>	Paul and Gillian Jenkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on</li> </ul>

	<p>the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18762
<b>Full Name</b>	Berkhamsted Citizens
<b>Company / Organisation</b>	Berkhamsted Citizens
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><i>Do you agree with the proposed approach to affordable housing?</i></b></p> <p><b>Yes</b></p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc. as the site to which it relates</p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18810

Full Name	Lyndsay Slater
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
Include files	
Number	Question 17
ID	LPIO18858
Full Name	Andrew and Margit Dobbie
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
Include files	
Number	Question 17
ID	LPIO18904
Full Name	Katherine Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<b>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</b>

	<p>...</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO18982
<b>Full Name</b>	Mrs Emma Robertson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Please find attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</b></p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally</p>



	<p>welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19045
<b>Full Name</b>	Barbara Gainsley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</p> <p>Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.</p> <p>Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.</p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc. as the site to which it relates.</li> </ul>

	<p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19102
<b>Full Name</b>	Bill Ahearn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I wish to register my objections to some of the proposals under consideration on the grounds they are simply to excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO19160
<b>Full Name</b>	Ms Sarah Hain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19218
<b>Full Name</b>	Grove Fields Residents Association
<b>Company / Organisation</b>	Grove Fields Residents Association
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19275
<b>Full Name</b>	Marcus, Jane, Abigail and Jennifer Fox
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Our family ( 4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed</p>

	<p>decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town's infrastructure. We feel strongly that green belt land should be preserved for future generations</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19329
<b>Full Name</b>	Stuart, Miranda & Melissa Kay
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as

	<p>confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19377
<b>Full Name</b>	Wai Tang and Greg Barfoot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please note we are aware that the Berkhamsted Residents Action Group (BRAG) has responded in full to the "Issues &amp; Options" consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.</p> <p>We wish to add our concerns to the DBC local plan issues and options consultation.</p> <p>We are particularly concerned about the following</p>

	<p>Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to "buy out" their obligation</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19425
<b>Full Name</b>	Philippa Jones
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan</p> <p><b>Question 17</b></p> <p><b><i>Do you agree with the proposed approach to affordable housing?</i></b></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the</li> </ul>

	<p>allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and “affordable” housing should be located in the same town/village etc. as the site to which it relates.</p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by ‘local’ residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19480
<b>Full Name</b>	John Wignall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate</p>



	mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19537
<b>Full Name</b>	Kevin Cullen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please refer to the attached report.(BRAG)</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19595
<b>Full Name</b>	Mark Lawson and Sharon Wilkie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that.</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19651
<b>Full Name</b>	Vivienne Inmonger
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<p><b>Your response - Please add your response here</b></p>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 17</p>
<p><b>ID</b></p>	<p>LPIO19710</p>
<p><b>Full Name</b></p>	<p>John Inmonger</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>No</p>
<p><b>Your response - Please add your response here</b></p>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p>

	<p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19764
<b>Full Name</b>	Ben Barth
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p><b>Question 17</b></p> <p><b><i>Do you agree with the proposed approach to affordable housing?</i></b></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the</li> </ul>

	<p>same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and “affordable” housing should be located in the same town/village etc. as the site to which it relates.</p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by ‘local’ residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19795
<b>Full Name</b>	Miss Hannah Moynehan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><i>"People in Berkhamsted, Northchurch and Tring are sadly being let down yet again by the Conservative council. The draft Dacorum Local Plan not only sacrifices precious green belt, it also completely fails to show how the council is going to deliver affordable housing or address the severe lack of investment in supporting infrastructure.</i></p> <p><i>At a very well attended meeting at the Rising Sun, Berkhamsted on 6th December, local Labour Party members from Berkhamsted, Northchurch and Tring therefore resolved to reject Dacorum's draft Local Plan and the Options proposed which would all mean the sacrifice of green belt land. We are not prepared to see green belt lost so that land speculators make vast profits from yet more £1 million homes. Instead, we are committed to campaign for a plan which is genuinely designed to meet the needs of this community. We believe people want to see green belt only allocated for development if guaranteed that more than 50% will be genuinely affordable housing (and at least half of that social housing). Our own young people, as well as the carers, teachers and NHS staff our families depend on, can no longer afford to buy or even rent around here. We are very short of suitable and affordable supported housing for older people. Yet none of these needs are addressed by the draft plan.</i></p> <p><i>Above all, we need to see a thorough assessment of the impact on this part of Dacorum's creaking infrastructure (public transport, cycling and walking, roads, parking, schools and playgrounds, GPs, sewers, water and utilities). It must start with the impact from recent existing housing developments, as well as the demands from</i></p>

	<i>any further building. So we are calling for the council to commit to active planning to meet those needs ahead of further development. And any future new housing must be developed sustainably meeting the highest environmental standards and avoid worsening traffic congestion, air pollution and road safety in Berkhamsted, Northchurch and Tring."</i>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19802
<b>Full Name</b>	Mrs Sagar Patel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	It's fair to say there is a vast shortage of housing in the area and I agree new affordable housing needs to be provided to cater for the needs of the community
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19833
<b>Full Name</b>	Jon Esson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p>

	<p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19870
<b>Full Name</b>	Pat McCombe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I have a real concern that although council has a target that 40 percent of houses built should be affordable housing, reports seem to indicate that developers are able to avoid this if they feel they will not make a reasonable profit.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19917
<b>Full Name</b>	Chris Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA )</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p>

	<p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO19974
<b>Full Name</b>	mrs sue van rhee
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p>



	<p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20031
<b>Full Name</b>	Kate and Ben Marston
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>As residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply</p>

	on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20088
<b>Full Name</b>	Maurice and Christine O'Keefe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20145

<b>Full Name</b>	Sherry and Haydn Bond
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20203
<b>Full Name</b>	Dianne Pilkington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<p><b>Your response - Please add your response here</b></p>	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 17</p>
<p><b>ID</b></p>	<p>LPIO20251</p>
<p><b>Full Name</b></p>	<p>Mr Peter Brown</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20306
<b>Full Name</b>	David Clarke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred</p>

to as "Grove Fields" is clearly unsuitable for residential development. I also believe that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.

Please accept this email and the attached report as my feedback on the proposed development of Tring.

**GFRA Response to Question 17, full document attached to question 46**

Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.

The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).

We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.

However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20364
<b>Full Name</b>	Deborah Turnbull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town.  <b>GFRA Response to Question 17, full document attached to question 46</b>

	<p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20412
<b>Full Name</b>	Jane Collis
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'.</li> </ul>

	<p>Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20446
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Any development must be of high quality homes the vast majority of which has to be affordable. Development must be mixed with appropriate commercial premises
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20473
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am writing in response to the Issues and Options consultation.</p> <p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p>



	<p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20521
<b>Full Name</b>	DR Brigitta Case
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the <b>Berkhamsted Citizens' Association</b> and the <b>Berkhamsted Residents Action Group</b>. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46</p>

## **Affordable Housing**

- There is a need for affordable housing in Berkhamsted.
- It is no great surprise that developers are keen to build in Berkhamsted where house prices are higher and there are bigger profits to be made. This explains why Berkhamsted is ahead of target. Unfortunately it is very largely NOT affordable housing that is being built.
- Allowing private landowners to sell Green Belt to developers whose main interest is profit will not lead to the affordable houses we need

### **BRAG response to Question 17 (please note full document is attached to Q46)**

**Question 17**      *Do you agree with the proposed approach to affordable housing?*

#### **Yes**

- Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent
- Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc

Berkhamsted Citizens response

***Do you agree with the proposed approach to affordable housing?***

#### **Yes**

- Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc. as the site to which it relates
- Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.

	<ul style="list-style-type: none"> <li>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20568
<b>Full Name</b>	Christine Manning
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><b><i>Do you agree with the proposed approach to affordable housing?</i></b></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 35% - 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc. as the site to which it relates.</li> </ul> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20640
<b>Full Name</b>	Jane Hawkins
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am writing with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20696
<b>Full Name</b>	Keiron Wybrow
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Please find attached a response document as commissioned by Grove Fields Residents association which I am a member of.

	<p>As well as this I would like to make my own personal feelings known.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20744
<b>Full Name</b>	Christopher Townsend
<b>Company / Organisation</b>	
<b>Position</b>	Councillor, Tring Town Council
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)</p> <p>The Town Council welcomes the emphasis being placed on the provision of affordable housing. There is a desperate need for housing that is within the reach of young families. The Town Council is hopeful that it will shortly be able to make a small contribution to increasing provision in locally.</p> <p>There is concern that a blanket application of the proportions suggested in paragraph 6.3.8 across the</p>

	<p>Borough should be avoided as this would not reflect local need.</p> <p>Further work needs to be done to ensure that when considering specific developments the affordable housing schemes put forward are appropriate to the local area. The priorities in provision are social rented and shared-ownership schemes.</p> <p>Consideration should also be given to 'starter homes' when opportunities present themselves.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20792
<b>Full Name</b>	Usha Kilich
<b>Company / Organisation</b>	Northchurch Parish Council
<b>Position</b>	Parish Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We agree in principle but suggest more affordable homes should be built as in 6.3.11, 35% to 40%. The affordable homes recently completed on Maylands Avenue are a credit to Dacorum. This is the standard that should be maintained elsewhere in the Borough. Also, the sizes of affordable homes should not be compromised. Local residents of Northchurch and Berkhamsted would struggle to buy in the area if they are on modest incomes.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20838
<b>Full Name</b>	Mr Iain Manson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p>

	<p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20914
<b>Full Name</b>	Mr Jake Storey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I live in Berkhamsted and have witnessed the size of the small town growing in an unsustainable manner. As a result I joined SYBRA and also now BRAG. I have attached the BRAG response to your proposals</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will</li> </ul>

	<p>be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO20969
<b>Full Name</b>	Mr & Mrs J.D Battye
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents' Action Group (BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG's responses under our names so that a complete repetition of BRAG's submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council's submission.</p> <p>Q17 BRAG</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely</li> </ul>



	<p>reduces the gain from the award of a planning consent</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul> <p><b>Berkhamsted Town Council response</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be ‘bought out’ by developers. We agree on the 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and “affordable” housing should be located in the same town/village etc as the site to which it relates.</p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by ‘local’ residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21054
<b>Full Name</b>	julie owen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield</p>

	<p>sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21119
<b>Full Name</b>	Sheron Wilkie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p><b>GFRA Response to Question 16, full document attached to question 46</b></p> <p><b>1 Governments draft figure 602</b></p> <p>It is clear that through the calculation of need undertaken by Dacorum Borough Council within the Strategic Housing Market Assessment (SHMA) a two stage Objectively Assessed Need has been undertaken in line with the approach the formula required in conjunction with the NPPF and meeting the subsequent requirements identified through <i>Hunston (2013) 14</i> and <i>Gallagher Estates (2014) 15</i>.</p> <p>It was accepted in <i>King's Lynn and West Norfolk (2015) 16</i> on the approach Green Belt and restrictive land should have in relation to housing supply and in particular the use of the five objectives of the Green Belt.</p> <p>In response to this position the council have undertaken a Green Belt review at Stages 1 and 2 to assess the applicableness of their Green Belt land in relation to the five fundamental objectives of the Green Belt in paragraph 80 NPPF terms. However on assessment in the SHMA it is not clear as to how the natural limitations of Dacorum has been taken into consideration in regards to their housing calculations. Whilst the 756 homes calculation has gone through the expected process</p>

(SHMA, Objectively Assessed Need, and outcome of proposed housing target) the Objectively Assessed Need stage has not sufficiently considered the natural limitations proposed to the Authority by its land designations such as the Green Belt and Chilterns AONB.

This comes across in the summary provided within the Issues and Options Paper on the matter whereby it is clear that the Authority's position is currently that they may be required to take on further housing supply requirements that are not able to be provided by surrounding authorities. By this logic therefore it would appear to be accepted by the Authority that there is scope for significant take on of supply despite the fact that Dacorum is significantly pressured by Green Belt and AONB designations in a manner that provides a questionable ability to deliver its own housing supply, never mind take on that of surrounding areas. As such therefore when undertaking the correct two stage FOAN process it is not considered at this stage that it has been proven, with regards to *King's Lynn and West Norfolk (2015)* that the natural restrictions provided by land that proven by the Green Belt review does meet the objectives of the Green Belt in paragraph 80 terms. This has been taken on as a restriction with regard to the calculation proposed of 750 dwellings per annum.

In the intervening period the government have published "*Planning for the right homes in the right places*" which provide a calculation approach that can be applied for the short term, until such a point where the Core Strategy is considered to be out of date (which is from September 2018 onwards). The subsequently calculation figure that could be applied from that point on is significantly higher (that in relation to point C of question 16) and given the significant difference between the two calculations it is considered that neither at this stage, given the draft nature of the formulas that are proposed to be applied and the significant ramp from one to the other without justification, that neither can be considered to be a reasonable or trusted starting point for assessing housing need at this present time.

As such it is our opinion that the housing need applicable to the Borough can more likely be applied to answer A of 602 homes per annum until proven otherwise; in that it is most likely a figure that sits below the 756 homes a year proposal when a proper consideration of the limitations associated with the Borough with regard to its Green Belt and AONB restrictions, are taken into consideration. In assessment of the SHMA, the weight prescribed to the Dacorum's limitation is not substantively applied do the expected housing market provision subsequently taken forward (at 728 additional homes) and whilst the subsequent 28 homes a year taken on under the Sedgfield test is considered appropriate that initial calculation of 728 is considered to be untested at this point.

It is our view that the limitations of delivery prescribed by the predominant Green Belt nature of the Borough is referenced and represented within the calculation figure in a manner that is more proportionate than its reference in the SHMA. Only after this examination can a robust

	<p>starting position be found for housing supply requirements that allow for the subsequent uplift through the Sedgefield test to be undertaken. The application of the Sedgefield test in this instance is not disputed, given the clear under delivery of housing supply proposed within the Borough across the previous plan period. In this regard we do not dispute the conclusions raised in the report on the examination of Dacorum Borough Council's Site Allocation Local Plan of 6th April 2017.</p> <p><i>14 Hunston Properties Limited v Secretary of State for Communities and Local Government and St Albans City and District Council (2013) EWHC 2678</i></p> <p><i>15 Gallagher Estates Limited and Anor v Solihull Metropolitan Borough Council (2014) EWHC 1283</i></p> <p><i>16 Kings Lynn and West Norfolk BUILDING CONTROL v Secretary of State for Communities and Local Government and Elm Park Holding Ltd (2015) EWHC 2464</i></p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21163
<b>Full Name</b>	St Albans Diocesan Board of Finance
<b>Company / Organisation</b>	St Albans Diocesan Board of Finance
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• SADBDF consider the affordable housing target of between 35% to 40% is within a reasonable range, and recognises the issues of affordability within the Borough</li> <li>• SADBDF suggest the Plan should consider the most appropriate location for affordable housing. Further evidence should be collated to inform the required tenure split across developments, as this is a matter than can greatly impact on viability</li> <li>• With regard to SADBDF's interest in the land west of Long Marston, there is no current identified area of concern in relation to the viability of the site or constraints on development that would affect the ability to provide affordable housing on site. It is expected that a policy-compliant scheme will come forward; however, flexibility within the policy is required to ensure there will be appropriate opportunity to ensure the delivery of the site</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21195
<b>Full Name</b>	Sarah Lightfoot
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Question 17</b>     <i>Do you agree with the proposed approach to affordable housing?</i></p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'.</li> <li>• Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable, it merely reduces the gain derived from the award of a planning consent.</li> <li>• 6.3.4 states "in considering the mix on individual development sites, the SHMA advises that we need to take into account the nature of the site and character of the area, evidence of need and the existing mix and turnover of properties in the locality."</li> <li>• Siting of Affordable and Social Housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc. The Green Belt sites in Berkhamsted would fail to meet these criteria.</li> <li>• 6.3.5 states "The SHMA indicated that the size of homes will also vary depending on their tenure. It suggests that we plan for mainly larger sized open market homes and smaller sized affordable homes. Our past experience suggests that larger greenfield sites are more likely to provide opportunities for family sized homes than brownfield sites in our towns and villages. These brownfield sites tend to be more suitable for smaller houses and flats."</li> <li>• Yet 6.3.11 states "We consider that our current approach to ask for higher levels of affordable housing on any future larger greenfield housing sites should continue i.e. asking for 40% rather than the standard 35% provision." These statements are contradictory.</li> <li>• Developers promoting Green Belt sites in Berkhamsted are claiming they will build 40% affordable housing – yet recent large sites have not delivered this and from the statements above it would seem that it is a false claim</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17

<b>ID</b>	LPIO21248
<b>Full Name</b>	Sarah Lightfoot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be taken into account. I strongly support their submission (below)</p> <p>In the AONB you can require affordable housing contributions on smaller sites than 11 or more. See for example the policy in the emerging South Oxfordshire Local Plan:</p> <p>"Policy H9: Affordable Housing</p> <p>On all sites where there is a net gain of 11 or more residential units* the council will require at least 40% of the residential units to be affordable housing, subject to the viability of this provision on each site.</p> <p>* except in the AONB where there is a net gain of 6 or more residential units the council will require at least 40% of the dwellings to be affordable housing.</p> <p>this provision will be sought as a financial contribution with the amount to be the equivalent to the cost of providing the affordable dwellings on-site."</p> <p>Source: South Oxfordshire publication stage local plan Oct 2017,  <a href="https://www.southoxfordshire.gov.uk/media/12184/2017-10-26-Local-Plan-2017-2026-Consultation-Document-2017-10-26.pdf">https://www.southoxfordshire.gov.uk/media/12184/2017-10-26-Local-Plan-2017-2026-Consultation-Document-2017-10-26.pdf</a></p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21318
<b>Full Name</b>	Antony Harbidge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually</p>

	<p>under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21364
<b>Full Name</b>	Helen Kington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b>      <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p>

	<ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21423
<b>Full Name</b>	Mr R Smith and Mr A Lyell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>2.1.4 The Landowners note the affordable housing target of between 35% to 40% is within a reasonable range, and recognises the issues of affordability within the borough</p> <p>2.1.5 The Landowners suggest The Plan should consider the most appropriate location for affordable housing. Further evidence should be collated to inform the required tenure split across developments, as this is a matter than can greatly impact on viability</p> <p>2.1.6 With regards to the landowners' interest in land at, Markyate, there is no current identified area of concern with regards to the viability of the site or constraints to development that would affect the ability to provide affordable housing on site and is expected that a policy compliant scheme will come forward; however, flexibility within the policy is required to ensure there will be appropriate opportunity to ensure the delivery of the site</p>
<b>Include files</b>	
<b>Number</b>	Question 17



<b>ID</b>	LPIO21494
<b>Full Name</b>	Hightown Housing Association
<b>Company / Organisation</b>	Hightown Housing Association
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Question 17 Do you agree with the proposed approach to affordable housing? Yes</b></p> <p>We support the policy to require a specific proportion of affordable housing within new developments.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21544
<b>Full Name</b>	Mrs Valerie Silverton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have read the proposals and strongly agree BRAG's responses.</p> <p><b>BRAG response to Question 17 (please note full document is attached to Q46)</b></p> <p><b>Question 17</b> <i>Do you agree with the proposed approach to affordable housing?</i></p> <p><b>Yes</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21601
<b>Full Name</b>	Mr Charlie and Claire Laing
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p><b>GFRA Response to Question 17, full document attached to question 46</b></p> <p>Again it is our position that the SHMA at this point in time has provided only generic, nonspecific guidance with regard to the approach that should be taken for affordable housing allocations.</p> <p>The SHMA provides an indication that the predominant provision of smaller sized affordable homes should take place within brownfield sites and whilst this is generally welcomed this does not take into consideration the density that can also be prescribed to these brownfield sites (given that full assessment of density, scale and massing remains missing from the Issues and Options consideration at this time).</p> <p>We support the appropriate delivery of a 35% delivery of affordable housing sites on sites of 11 or more dwellings where viability accords with that approach.</p> <p>However it should be noted that the approach to affordable housing percentages should in our opinion be subject to the review of density and height standards associated with development; given that if developers are able to bring forward schemes which provide a larger and more efficient contribution towards housing supply on brownfield sites within settlements the local authorities should be flexible with regard to the specific appropriate mix of affordable housing on those sites in order to make sure that the full contribution of housing supply in that instance is brought forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21688

<b>Full Name</b>	Countryside Properties (UK) Ltd
<b>Company / Organisation</b>	C/O Bidwells
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• CPUK The affordable housing target of between 35% to 40% is within a reasonable range, and recognises the issues of affordability within the borough.</li> <li>• CPUK suggest The Plan should consider the most appropriate location for affordable housing. Further evidence should be collated to inform the required tenure split across developments, as this is a matter than can greatly impact on viability.</li> <li>• With regards to CPUK interest in land South of Aylesbury Road, Tring, there is no current identified area of concern with regards to the viability of the site or constraints to development that would affect the ability to provide affordable housing on site and is expected that a policy compliant scheme will come forward; however, flexibility within the policy is required to ensure there will be appropriate opportunity to ensure the delivery of the site.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21715
<b>Full Name</b>	Roger Saller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perceptive on what made the town attractive and what is now at risk.</p> <p>Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.</p> <p>BRAG response</p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not</li> </ul>

	<p>permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21732
<b>Full Name</b>	Mr John Mawer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The simplistic view of the shortage of homes dominates the approach. Seeking land from landowners ensures a focus on profitability rather than need. The need is for truly affordable housing for those on low and average income, particularly those seeking their first home. This will not be served by the approach adopted which will generate release of the most profitable sites.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21747
<b>Full Name</b>	David Lang
<b>Company / Organisation</b>	Hemel Hempstead Constituency Labour Party
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Social and Affordable housing are two of the most important issues for Dacorum and a generation struggling to find adequate and affordable accommodation for their families. This is something we

	frequently hear on the doorstep and we want to see full assessments of the need for affordable homes for rent and purchase, across the borough. The percentage need should to be fully assessed for the relevant areas of Dacorum and drive the decision making. We would like to see the agreed percentage need for social and affordable dwellings maintained and avoidance of the 'non-viability' arguments. Professional companies must surely be able to cost their profit and margins with accuracy at the outset of a project and this (outside major unforeseen difficulties) makes viability claims a 'try-on'.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21758
<b>Full Name</b>	Elizabeth Hamilton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Question 17 asks about affordable housing. In my view the highest priority should be given to the provision of affordable housing, including on the Local Allocation sites already agreed for Green Belt release. It is well known that levels of affordable housing are not being met on many market housing sites as developers seek to claim that by building affordable housing they will not make sufficient profit margin. I believe that Dacorum should be enforcing its affordable housing targets robustly, as well as seeking innovative ways to achieve the housing required by other means including expansion of its own New Build programme.
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21807
<b>Full Name</b>	Professor Jim McManus
<b>Company / Organisation</b>	Public Health Service (HCC)
<b>Position</b>	Director
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Housing has a clearly evidenced influence on individual and population health. The quality and affordability of houses can determine the health status of residents. Living in good quality and affordable housing is associated with numerous positive health outcomes for

	<p>the general population and those from vulnerable groups.</p> <p>Public Health England sets out the fundamental objective that <i>everyone has a home in which to start, live and age well</i>. Individual health will benefit from:</p> <ul style="list-style-type: none"> <li>• <b>A healthy home:</b> warm, safe, free from hazards</li> <li>• <b>A suitable home:</b> suitable to household size, specific needs of household members e.g., disabled people, and to changing needs e.g., as they grow up, or age</li> <li>• <b>A stable, secure, home</b> to call your own: without risk of, or actual, homelessness or other threat e.g., domestic abuse</li> </ul> <p><i>Housing: our requests from the Plan</i></p> <p>To implement these principles it is important that new housing is high quality, affordable and accessible. We agree that the new Local Plan should continue with the current requirements for levels of affordable housing but affordable housing should be identified and provided in a way which:</p> <ul style="list-style-type: none"> <li>• is integrated</li> <li>• is affordable for groups with specific needs</li> <li>• encourages social connectivity; and</li> <li>• has equitable access to green/open space.</li> </ul> <p>Consideration should also be given to provision of diverse housing types and affordable rental housing</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21884
<b>Full Name</b>	Louis Quail
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the argument for building on greenbelt land should only be one of last resort , there are plenty of other options left before launching off this one way route .</p> <p>Berkhamsted Residents Action Group response:</p> <ul style="list-style-type: none"> <li>• Affordable housing should be delivered when identified as part of site development and not</li> </ul>

	<p>permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</p> <ul style="list-style-type: none"> <li>• Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO21952
<b>Full Name</b>	Thomas and Margaret Ritchie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council's response:</p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc as the site to which it relates. Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard.</p>
<b>Include files</b>	

<b>Number</b>	Question 17
<b>ID</b>	LPIO21996
<b>Full Name</b>	Mr Paul Phipps
<b>Company / Organisation</b>	Whiteacre Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As drafted, we are concerned that the proposed Affordable Housing policy is not progressive in relation to smaller sites. We recognise that the Borough is constrained by national planning policy, but would highlight that a threshold of affordable housing provision from 11 dwellings has the effect of under-providing much needed affordable housing, particularly in settlements such as Bovingdon, where past housing delivery has come from smaller windfall sites.</p> <p>If the policy is to remain as drafted, then the council will need to ensure that the larger available housing sites (such as Grange Farm) are brought forward as soon as possible, as they will deliver much needed affordable housing, where smaller sites will not.</p> <p>As a Green Belt release, we accept that Grange Farm will also deliver the enhanced level of 40% affordable housing. Furthermore, that affordable housing may assist in providing homes which prison officers can afford to live in, helping to address the severe recruitment crisis which led to recent unrest at the Mount Prison in Bovingdon.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO22032
<b>Full Name</b>	Gallagher Estates
<b>Company / Organisation</b>	Gallagher Estates
<b>Position</b>	
<b>Agent Name</b>	Mrs Hanna Staton
<b>Company / Organisation</b>	Pegasus Group
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>Gallagher Estates disagree with the proposal to ask for higher levels of affordable housing on large greenfield housing sites than on other sites. In our opinion this unfairly penalises allocated sites and does not take account of the wider contributions often made by large sites, for example, by the delivery of potentially expensive infrastructure and facilities that serve the wider community.</li> </ul>



	<ul style="list-style-type: none"> <li>• The balance of affordable housing requested by the Council should reflect the most up-to-date needs in the Borough. A Local Plan covers an extensive period of time during which needs are likely to change and accordingly the policy position should be reviewed.</li> <li>• As with market housing, affordable housing requirements must be based on a sound understanding of needs and viability, and affordable housing policy must be expressed to be subject to viability tests. The Council should also consider the implications of the adopted Community Infrastructure Levy charging schedule, which will have additional implications for the viability of development.</li> <li>• The proposed 35% to 40% figures for affordable housing delivery will be challenging. However, it is noted that should the Council choose growth Option 1 (602 homes per year) 61% of the homes would need to be affordable to meet Dacorum's estimated need for 366 affordable homes per year, as identified in the SHMA. This falls to 48% of homes under growth Option 2 (which requires 756 homes per year) and 33.3% of homes under growth Option 3 (1,100 homes per year). These figures demonstrate, as highlighted earlier, that the highest option for growth would provide the greatest opportunity for meeting the annual affordable housing requirement.</li> </ul>
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<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO22132
<b>Full Name</b>	Mrs Hayley Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO22176
<b>Full Name</b>	Mr Peter Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	

<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO22220
<b>Full Name</b>	Miss Sophie Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO22498
<b>Full Name</b>	Mr & Mrs Lisa-Lotte & Henrik Hansen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please find below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below)</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the 'viability argument'. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a 'market housing' level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.</li> <li>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO22548
<b>Full Name</b>	Mrs C Longbottom

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I support all answers and comments to the Issues &amp; Options Consultation document noted on the Berkhamsted Town Council website</b></p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc as the site to which it relates.</p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard.</p>
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO22582
<b>Full Name</b>	Berkhamsted Schools Group
<b>Company / Organisation</b>	The Berkhamsted Schools Group
<b>Position</b>	
<b>Agent Name</b>	Kevin Rolfe
<b>Company / Organisation</b>	Aitchison Raffety
<b>Position</b>	Group Director, Development & Planning
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The consultation document suggest that housing allocations should provide 40% affordable housing. This is not considered to be reasonable, as current adopted Local Plan Policy CS19 seeks that 35% of the new dwellings should be affordable. The provision of 35% affordable housing is justified at paragraph 14.32 which states that it is "realistic and achievable, when compared with past achievement, economic conditions and costs associated with new building".</p> <p>In our view, new allocated sites should be treated in exactly the same way as unallocated greenfield sites, which have a requirement for 35% affordable housing.</p>

The viability of unallocated green field sites will be the same as allocated sites, so there is no justification for seeking an uplift in the level of affordable housing.

The increase in the level of affordable housing to 40% for allocated sites raises viability issues, taking account of build costs and the provision of Infrastructure and CIL which is very high in some areas, such as Berkhamsted. By way of comparison, the provision of 40% affordable housing would be higher than the current London Plan requirement of 35%, as set out in the newly adopted affordable housing and viability supplementary planning guidance 2017.

It is accepted that the site at Haslam Fields will be policy compliant in respect of affordable housing.

To this end the School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.

**Would help address the shortage of affordable homes**

- It is acknowledged by all parties that house prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local people. The proposed site offers an opportunity to provide well designed affordable housing for local people
- Policy CS19 of the Dacorum Core Strategy sets a target of 35% of all new dwellings. The site has an indicative capacity of 80 to 100 dwellings in total, and at 35% provision would equate to 28 to 35 new affordable homes.
- It is acknowledged that some previous Green Belt releases have been allocated on the basis of 40% affordable housing provision. Based on the sites indicative capacity of 80-100 dwellings in total, 40% provision would equate to 32 to 40 new affordable homes. Any proposed development at Haslam Fields will be policy compliant in respect of affordable housing
- The latest Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum. The analysis has been based on meeting affordable housing need over the 23-year period from 2013 to 2036

Area	Current Supply	Newly Forming Need	Existing Households Falling into Need	Total Need
Dacorum	581	366	308	947

Table 3.9 of Housing Market Needs Assessment (2016)

- The table below shows the gross affordable housing completions that have been recorded in each of the past 5 years, giving an average of 164 affordable dwellings per annum. It demonstrates that past delivery has consistently been significantly below the identified need for affordable housing. Even if the Council achieves 35%

affordable housing in respect of every new development over the plan period, there will still be a very significant shortfall of affordable housing in Dacorum

**YEAR  
COMPLETIONS  
AFFORDABLE HOUSING  
NEED  
SHORTFALL**

2015/16

203

366

-163

2014/15

254

366

-112

2013/14

123

366

-243

2012/13

92

366

-274

2011/12

149

366

-217

5 year average annual rate of provision

164

366

-202

*Dacorum affordable housing completions against future need*

- Having regard to the above, it is considered that the provision of affordable housing, as part of the allocation and development of the site, should be afforded substantial weight in support of the proposal.
- To this end The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing

It is also worth noting that the School experiences big issues recruiting staff due to high local house prices and part of any allocation at Haslam Fields could potentially be utilised for the provision of an element of staff accommodation which would be a benefit to sustainability

**Include files**

Number	Question 17
ID	LPIO22618
Full Name	Mr & Mrs Mehew
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We write as residents of [REDACTED]</p> <p>[REDACTED]</p> <p>in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) (see comments LPIO18384, 18385) and the draft response prepared by Berkhamsted Town Council.</p> <p><b>Berkhamsted Town Council Response:</b></p> <p>Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc as the site to which it relates.</p> <p>Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc</p> <p>Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard.</p>
Include files	
Number	Question 17
ID	LPIO22695
Full Name	Lewis Claridge

<b>Company / Organisation</b>	NHBE
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<b>Question 17 – Do you agree with the proposed approach to affordable housing?</b> No comment
<b>Include files</b>	
<b>Number</b>	Question 17
<b>ID</b>	LPIO22802
<b>Full Name</b>	Mr Patricia Wheway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The approach to affordable housing should include options such as provision for council housing and Housing Association schemes, as well as opportunities for self-build and co-housing schemes. These schemes can provide quality new buildings at lower cost than “affordable homes” by avoiding developers’ profit margins.
<b>Include files</b>	

## Report Settings Summary

Event	<b>Local Plan Issues &amp; Options November 2017</b>
Total Responses	<b>22,707</b>
Total Respondents	<b>2,376</b>
Filtered Responses	<b>297</b>
Filtered Respondents	<b>295</b>
Questions	<p><b>Question 18</b></p> <p><b>Do you agree with the proposed approach to planning for specific types of housing?</b></p> <p><b>Yes / No</b></p> <p><i>If no, please explain what alternative approach, or changes to our current approach, you would like and why. Where possible, support your answer with reference to any evidence.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	<b>ID-4764254-QUESTION-18</b>
Pivot	<i>(none)</i>
Document Name	Question 18 - Summary Report
Created on	2019-04-17 14:50:29
Created by	Strategic Planning Admin



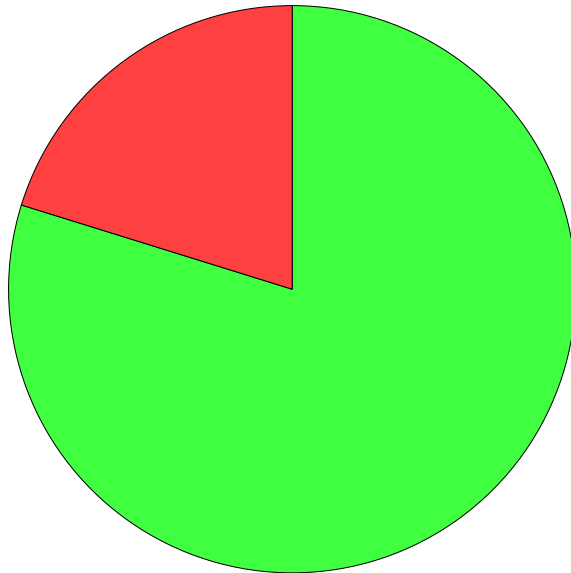
Your Opinion

Question responses: 297 (100.00%)

Question 18

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

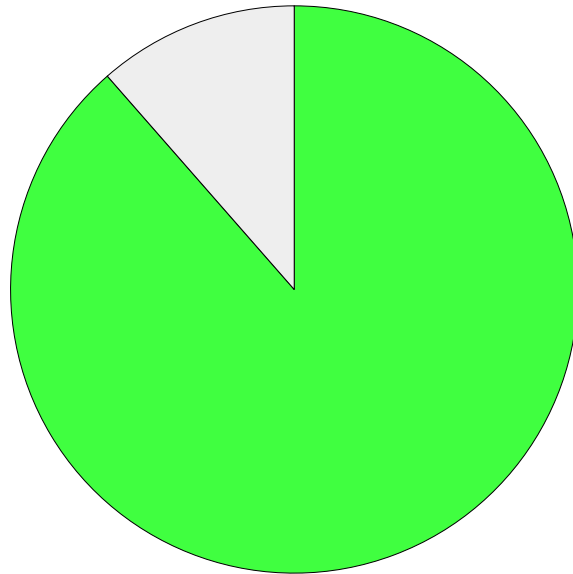
Yes / No



	% Total	% Answer	Count
Yes	79.80%	79.80%	237
No	20.20%	20.20%	60
Total	100.00%	100.00%	297

Responses



Question responses: **263 (88.55%)**



	% Total	% Answer	Count
<span style="color: green;">■</span> [Responses]	88.55%	100.00%	263
<span style="color: lightgrey;">■</span> [No Response]	11.45%	--	34
Total	100.00%	100.00%	297

## Supporting evidence

Question responses: **5 (1.68%)**

	% Total	% Answer	Count
 [File(s) Uploaded]	1.68%	100.00%	5
 [No Uploads]	98.32%	--	292
Total	100.00%	100.00%	297

## Issues and Options All Responses to Question 18

<b>Number</b>	Question 18
<b>ID</b>	LPIO53
<b>Full Name</b>	Mr Derin Mellor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	What about the older people who are just down sizing? These are not people who need to go into homes. They may or may not need assistance. Though having easy access to healthcare and community centres but still being part of the greater community is essential. There is nothing worse than to create isolated OAP ghettos
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO87
<b>Full Name</b>	Mr John Lilley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	XXXXXXXXXX
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO180
<b>Full Name</b>	Mr John Shaw
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO333
<b>Full Name</b>	Mr David Stanier

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP10426
<b>Full Name</b>	Mrs Carole Freed
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP10455
<b>Full Name</b>	Ms Julia Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP10630
<b>Full Name</b>	Mrs Carole Stokes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Multi purpose housing for young people starting out and older people down sizing is needed. Not everyone over 60 needs a care home!

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO670
<b>Full Name</b>	Mr David Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO777
<b>Full Name</b>	Mr Hemant Patel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO866
<b>Full Name</b>	Mr Stephen Bevan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO1036
<b>Full Name</b>	mr Tish Seabourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	1 Yes but • Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills. • Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO1094
<b>Full Name</b>	Ms Tish Seabourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Berkhamsted in particular requires more housing for the elderly. Such housing needs to close to the centre of town along the valley, not up steep hills.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO1133
<b>Full Name</b>	Mrs Saunders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Towns need young people to survive. Tring already has a high proportion of older residents. If you continue to allow developments of only large expensive houses and accommodation for over 55s, but not provide anywhere affordable to the local young residents, they will move elsewhere and the town will die.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO1211
<b>Full Name</b>	Mr Bernard Richardson
<b>Company / Organisation</b>	
<b>Position</b>	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 18
ID	LPIO1400
Full Name	Mr Matt Clarke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Perfectly adequate accommodation exists. No further sites required
Include files	
Number	Question 18
ID	LPIO1613
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 18
ID	LPIO1617
Full Name	Mr John Ingleby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	"6.3.25 Local knowledge of demand and the availability of suitable housing stock will help inform decisions on the appropriate mix of specialist housing in development schemes." This local knowledge can only be achieved



	with the help of a survey of local residents, i.e. a Neighbourhood Plan
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO1683
<b>Full Name</b>	Jenny Thorburn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes to active policy making for multi occupancy housing. Also to self building and other small scale unconventional development.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO1686
<b>Full Name</b>	Ms G Puddiphatt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO1744
<b>Full Name</b>	Mr Kenneth Watts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The demographic of many of the large and smaller village communities comprise older people with large family homes. Others have commented that not everyone who is retired or in the 60's needs a care facility! It is quite possible however that they would welcome the opportunity to downsize in the future. This would release a significant number of family sized houses, albeit at the more expensive end of the market. Villages have increasingly been attractive places

	to live and market forces will prevail. That said, if there is no suitable housing stock to downsize to, then the larger houses will not reach the market in sufficient numbers to meet demand and additional valuable Green Belt land will be sacrificed to accommodate that demand. Higher density accommodation such as high-quality apartment complexes may be one solution that could help this problem and limit greenfield/Green Belt land take.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2021
<b>Full Name</b>	Mrs Christine Mabley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I think each community should be examined for its make up. For example, the canal households in Bourne End need to be seen as part of our housing pattern. What proportion of itinerant households should be considered reasonable?
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2106
<b>Full Name</b>	Mr Neale Dale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Mr Andrew Boughton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Here is a summary of the position of Inspire Villages Group who are specialist providers and operators of Care Villages (Continuing Care Retirement Communities) .  <b>There will be an additional 13680 persons over 65 and an additional 8729 persons over 75 by the end of the plan period in the District. The SHMA suggests an annual requirement of 72 units specialist housing for older people which (although 10% of potential levels of total housing delivery) is actually a significant undershoot of potential demand as supporting evidence shows, and neglectful of the economic and social potential locked in to the wholly-owned under-occupied homes of older</b>

people. 60% of those aged 65 or over own their home outright and the majority of those homes are under-occupied, and/or unsuitable for a range of reasons.

Downsizing from under-occupied and unsuitable housing, with a release of equity for care provision, into housing-with-care is an economic and social opportunity which the new LP must not miss having regard to the unsustainable demands being made upon social provision and the NHS; for instance, loneliness has health impacts (negative) whereas moving into supportive housing or housing with care has the opposite effect as our supporting documents indicate.

The quantitative assessment for the requirement of specialist housing in the SHMA is incorrectly derived from applying the Housing LIN multiplier to population *increase* rather than to the gross population of the relevant age cohort and then deducting provision. Consequently the correct methodology would set a requirement for Dacorum of  $(21.56 \times 170) - \text{current provision (159)} = 3506$  units or 185 units on an annual basis including housing-with-care.

Currently on a national basis roughly one third of such 'specialist housing' is provided as housing with care (extra-care/CCRC) which suggests an annual requirement of 60 units of extra care/CCRC per annum through the plan period and 120 units of other forms of retirement housing, The SHMA[1] also confirms a move towards Extra-Care housing and away from institutional care.

This level of provision would not, however, address the imbalance suggested by comparison with equivalent markets and it is therefore important that the LP does not close down opportunity for additional housing-with-care to be delivered above this figure.

In a national context, whereas in the equivalent countries such as the USA, New Zealand and Australia the proportion living in housing with care varies between 5.25% and 6.4% of the population aged 65 or over, in England this is just 0.7%. Clearly there must be pent-up (or latent) demand for housing with care which the planning system should recognise and facilitate in pursuit of the economic and social benefits.

It is also highly relevant that delivery of housing-with-care is not possible through the current buy-build-sell business model of mainstream housebuilders which means robust use-specific policy and discrete provision/allocations are necessary for the plan to be effective. This is important because proportionate delivery through housing mix policies elsewhere have seen the 'C2' provision merged with an affordable requirement when the main demand for housing with care is for owned (leased) property. Also due to the characteristics of the market for housing land and the dominant position of mainstream house-builders,

	<p>housing with care providers are often left to windfall provision which is simply unrealistic when the typical land-take for a care village is no less than 4.5 hectares/150 units due to the critical mass involved in the on-site facilities which are provided.</p> <p>We attach a supporting statement which includes a suggested policy approach together with document referred to in our text.</p>
<b>Include files</b>	<a href="#">BB Architecture and Planning Ltd - Inspire Retirement Village Group submission and supporting Docs.pdf</a>
<b>Number</b>	Question 18
<b>ID</b>	LPIO2216
<b>Full Name</b>	Mrs Melanie Flowers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Affordable and attractive options for retirement communities are unavailable meaning that many family homes are occupied by single older people or couples. Rather than building only nursing homes or expensive 'McCarthy & Stone' type developments, surely if each town had a retirement option in an attractive location that people actually wanted to live in (with associated health centre and social aspects) it would ease the pressure on housing. This does not seem to have been considered.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2323
<b>Full Name</b>	Mr George Bull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2477
<b>Full Name</b>	Mr Timothy Copeman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	surely you are joking, there is no way that this is an acceptable proposal
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2547
<b>Full Name</b>	MRS Lesley Culley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2654
<b>Full Name</b>	Mr Alan Andrews
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	More housing for older residents. Small bungalows so they can downsize and release housing for younger people
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2697
<b>Full Name</b>	Mrs Marriott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	It is good that things like Traveller's sites are considered. There is limited scope available for delivering housing for the ageing population which is both affordable and well placed for the right level of facilities. With the numbers quoted above, a better level of planning is

	required for delivering the right numbers of housing stocks.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2813
<b>Full Name</b>	mrs Gillian Hooper
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	More 1-2 bedroom homes should be built for first time buyers.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO2872
<b>Full Name</b>	Mr Antony Harbidge
<b>Company / Organisation</b>	Berkhamsted Residents Action Group (BRAG)
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3083
<b>Full Name</b>	mr hugh siegle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3156
<b>Full Name</b>	Mr John Walker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3358
<b>Full Name</b>	Mrs Margaret Stanier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3377
<b>Full Name</b>	Mrs Victoria Bate
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Local neighbourhood plans would determine local needs.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3385
<b>Full Name</b>	Mr B. Bradnock
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince

<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Please see paragraph 2.31 to 2.33 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (9)</a>
<b>Number</b>	Question 18
<b>ID</b>	LPIO3426
<b>Full Name</b>	Mrs Ann Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Within a development there should be a mix of sizes of units and types. Smaller terraced style houses which are suitable for both the young and old would create a mixed community who can help each other. Less large 4+ houses which don't fulfil the need at the beginning and end of the property owning cycle.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3480
<b>Full Name</b>	Mrs Louise Saul
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Hard to say without more detail
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3577
<b>Full Name</b>	Mrs Sandra Jackson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No



<b>Your response - Please add your response here</b>	<p>When a particular community chooses to be part of society then their additional housing needs can be considered.</p> <p>If neighbouring communities (St Albans) cannot work together with each other (Dacorum), then there is no hope for joined-up thinking in any future developments.</p> <p>The need for homes for older people is clear, but I cannot believe Dacorum Borough Council or even Herts County Council will provided these places at a reasonable cost, so you are then held to ransom by businesses who exist to make a profit.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3679
<b>Full Name</b>	Ilyn horne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Already within Kings Langley we have 7 retirement/care homes. with a large care home being built in the village and potentially a retirement development.</p> <p>I fundamentally disagree with separating age groups. The whole point of the word 'community' means bringing different people together. Enabling the old to co-exist with the young provides that feeling of community. go back to the 40's/50's/60's/70's and you will find that there were streets full of different people with different needs, but in essence they were communities. Shouldn't we be encouraging this approach to living.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3699
<b>Full Name</b>	Mr Andrew Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Generally yes, but similar considerations need to be applied as the response above to Question 17.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3782

<b>Full Name</b>	Mr Anthony Warren
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There needs to be a separate approach for villages where there is little infrastructure. affordable housing doesn't just mean flats but family homes 3, 4 and 5 bedrooms.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO3966
<b>Full Name</b>	Mr Tim Varley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO4030
<b>Full Name</b>	Mr R. Latham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Please see paragraph 2.31 to 2.33 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (25)</a>
<b>Number</b>	Question 18
<b>ID</b>	LPIO4078
<b>Full Name</b>	Mr M. Chester
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince

<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Please see paragraph 2.31 to 2.33 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (41)</a>
<b>Number</b>	Question 18
<b>ID</b>	LPIO4134
<b>Full Name</b>	Mr Graham Hoad
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	In case of homes for older people, consideration should be given to requiring homes to be built for adaptability, to allow people to live in their homes for as long as possible and for future conversion to flats.  I also strongly agree that serviced land be pursued and made more widely known. Self-build cooperatives might be encouraged.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO4143
<b>Full Name</b>	Mr D. Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Miss Lydia Prince
<b>Company / Organisation</b>	DLP Planning Limited
<b>Position</b>	Planner
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Please see paragraph 2.31 to 2.33 in attached report.
<b>Include files</b>	<a href="#">Local Plan Issues and Options (57)</a>
<b>Number</b>	Question 18
<b>ID</b>	LPIO4449
<b>Full Name</b>	Mr Robert Bailey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	Berkhamsted needs accommodation for younger people starting out on the housing ladder and for older people down-sizing from larger family homes. Not just more care home places.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO4706
<b>Full Name</b>	Mr Keith Bradbury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO4784
<b>Full Name</b>	Mrs Joanna Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Please include young people in your plans.They want to live here too.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5029
<b>Full Name</b>	Mr Chris Lumb
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	But I am concerned that there needs to be more accommodation in Berkhamsted for one-person households, and at the same time that the higher proportion of older people in Berkhamsted also needs to be kept in mind so that adequate provision of suitable 'retirement housing' can be made available.
<b>Include files</b>	

<b>Number</b>	Question 18
<b>ID</b>	LPIO5078
<b>Full Name</b>	Mr Peter Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>But Berkhamsted has a high proportion of older population and desperately needs appropriate housing: eg. close to the town centre, away from steep hills and with good public transport.</p> <p>Berkhamsted also needs more one-person accommodation.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5389
<b>Full Name</b>	Mr Reuben Bellamy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>It will be particularly important that the local plan sets out how the need for specialist older person accommodation will be met, given the well understood demographic trend identified in paragraph 6.3.24.</p> <p>At paragraph 159 of the NPPF there is a requirement to identify the scale of housing needed for all types of housing, including older people. In addition, the Planning Practice Guidance advises; "This could include sites for older people's housing including accessible mainstream housing such as bungalows and step-free apartments, sheltered or extra care housing, retirement housing and residential care homes. Where local planning authorities do not consider it appropriate to allocate such sites, they should ensure that there are sufficiently robust criteria in place to set out when such homes will be permitted. This might be supplemented by setting appropriate targets for the number of these homes to be built. (Paragraph: 006 Reference ID: 12-006-20150320)"</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5441
<b>Full Name</b>	Mr Pdraig Dowd
<b>Company / Organisation</b>	

<b>Position</b>																					
<b>Agent Name</b>																					
<b>Company / Organisation</b>																					
<b>Position</b>																					
<b>Your Opinion - Please state your opinion here</b>	No																				
<b>Your response - Please add your response here</b>																					
<b>Include files</b>																					
<b>Number</b>	Question 18																				
<b>ID</b>	LP105491																				
<b>Full Name</b>	Mr Garrick Stevens																				
<b>Company / Organisation</b>																					
<b>Position</b>																					
<b>Agent Name</b>																					
<b>Company / Organisation</b>																					
<b>Position</b>																					
<b>Your Opinion - Please state your opinion here</b>	Yes																				
<b>Your response - Please add your response here</b>	<p>Yes, but...</p> <p>Berkhamsted is identified as having a high proportion of older population and so there is a need for the provision of specialist accommodation which should be close to the town centre and not reliant on car travel, cycling or walking up steep hills.</p> <p>Para 6.3.26 of the SHMA refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not consider the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered.</p> <p>Berkhamsted has limited provision for one-person accommodation – this needs to be addressed in plans.</p> <p>It is highly desirable that the proportion of new dwellings should follow a trajectory mapped out in the SHMA Table 77 [page 189] and Para 10.66.</p> <p>Table 77: Recommended Housing Mix - HMA</p> <table border="1"> <thead> <tr> <th></th> <th>1 bed</th> <th>2 bed</th> <th>3 bed</th> <th>4+ bed</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>5-10%</td> <td>25-30%</td> <td>40-45%</td> <td>20-25%</td> </tr> <tr> <td>Affordable</td> <td>30-35%</td> <td>30-35%</td> <td>25-30%</td> <td>5-10%</td> </tr> <tr> <td>All Dwellings</td> <td>15%</td> <td>30%</td> <td>40%</td> <td>15%</td> </tr> </tbody> </table>		1 bed	2 bed	3 bed	4+ bed	Market	5-10%	25-30%	40-45%	20-25%	Affordable	30-35%	30-35%	25-30%	5-10%	All Dwellings	15%	30%	40%	15%
	1 bed	2 bed	3 bed	4+ bed																	
Market	5-10%	25-30%	40-45%	20-25%																	
Affordable	30-35%	30-35%	25-30%	5-10%																	
All Dwellings	15%	30%	40%	15%																	
<b>Include files</b>																					
<b>Number</b>	Question 18																				

<b>ID</b>	LPIO5517
<b>Full Name</b>	Ms Geraldine Whiteside
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	No housing development should take place in what is currently designated green belt. None of the Kings Langley sites mentioned in the plan, including Shendish, are acceptable because they are in the green belt.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5607
<b>Full Name</b>	Mrs Christine Cosgrave
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	XXXXXXX There is a ridiculous number of over 60's housing being built already
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5714
<b>Full Name</b>	Mr Alastair Greene
<b>Company / Organisation</b>	Little Gaddesden Parish Council
<b>Position</b>	Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5776
<b>Full Name</b>	Mr Quentin Ross-Smith
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5864
<b>Full Name</b>	Mr Michael Lelieveld
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We concur with the response provided by Berkhamsted Town Council to this question (being Yes, but.....).
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5888
<b>Full Name</b>	Mr Grahame Partridge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO5965
<b>Full Name</b>	Ms Fiona Coulling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	In the main, but Foyer Work/live accommodation should be considered to encourage younger people to live and work in the Borough in affordable accommodation.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6049
<b>Full Name</b>	Georgina Tregoning
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I feel consideration should be given to increasing the number of homes available for elderly people, both single and couples, in shared communities. Ideally if possible these should be situated where the residents can still mix with all ages e.g. perhaps with a nursery at certain times of the week.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6301
<b>Full Name</b>	Miss Lucy Muzio
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6309
<b>Full Name</b>	Miss Lucy Muzio
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	

<b>Number</b>	Question 18
<b>ID</b>	LPIO6398
<b>Full Name</b>	Dr Melvyn Else
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Berkhamsted has a high proportion of older people. There needs to be more provision for specialist accommodation in the plans. Sites such as the land around Edgeworth House which would not be reliant on car travel or walking up steep hills would be one ideal location. It has buses passing on the High Street, a new Lidl store almost next door and is a sustainable development. Easy access to lots of facilities.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6405
<b>Full Name</b>	Mr Nicholas Ring
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Villages need young people to survive and Kings Langley already has a high proportion of older residents. If you continue to allow developments of only large expensive houses and accommodation for over 55s, but not provide anywhere affordable to the local young residents, they will move elsewhere and the village will die. Most of our friend's children moved north to Leighton Buzzard and Milton Keynes to find affordable homes.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6605
<b>Full Name</b>	Mr Andrew Lambourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6690
<b>Full Name</b>	Mr Nick Hollinghurst
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	With regard to the Gypsy & traveller site provision, this should be based on more up-to-date demand forecasts.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6724
<b>Full Name</b>	Mr Geoff Latham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Provision should be made, but it is not right that certain people should be given rights and privileges not available to everyone.</p> <p>Any provision for transient housing should be open to anyone wanting to choose that lifestyle and high standards of appearance and maintenance need to be assured.</p> <p>My previous comments on retirement provision also apply here, whilst care/ nursing home demand will probably exceed the figures suggested. Planning for and implementation of policy to deal with the post war population boom has fallen short at every stage, being kicked down the line as someone else's problem until too late to implement. The dying out of this generation would have been thought of as solving many of the problems, but this does not seem to be borne out by the population projections.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6899
<b>Full Name</b>	Bradford Gunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6938
<b>Full Name</b>	Mr Clive Birch
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population and therefore requires provision for appropriate accommodation in an appropriate location within plans</li> <li>• Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in the plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6954
<b>Full Name</b>	Mr Edward Castle-Henry
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Your proposals seem good, but I also feel low impact buildings should also have its own place as a specific type of dwelling.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO6997
<b>Full Name</b>	mr michael hicks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	Sites should scattered through the borough with no clusters. Sites should be allocated where the need is
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO7108
<b>Full Name</b>	Mr & Mrs Fox
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our names.</p> <p>BRAG RESPONSE TO Q18 (FULL DOC ATTACHED TO Q46)</p> <p>Question 18</p> <p><i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p>Yes but</p> <p>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc <input type="checkbox"/></p> <p>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO7319
<b>Full Name</b>	Brian and Heidi Norris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We fully understand the need for additional housing in this country, but it should not be to the detriment of towns

	<p>such as ours. We do not intend to reply to the 46 questions one by one, but support the answers given by the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group and support Option 1B in the Strategy Plan. Even this number of 600 further homes is, in our view, more than enough, but we understand that is an existing commitment.</p> <p>BRAG response to Question 18 (please note full document is attached to Q46)</p> <p>Question 18</p> <p><i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p>Yes but</p> <p><input type="checkbox"/></p> <p>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</p> <p><input type="checkbox"/></p> <p>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO7373
<b>Full Name</b>	Mrs Helen Harding
<b>Company / Organisation</b>	Chiltern & South Bucks District Council
<b>Position</b>	Principal Planner
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Thank you for consulting Chiltern and South Bucks District Council and for your continuing engagement on Duty to Co-operate matters with the Councils in relation to the emerging Dacorum Plan and the joint Local Plan Chiltern and South Bucks.</p> <p>I attach the response of Chiltern and South Bucks District Council on your reg 18 Issues and Options consultation. The response has been agreed with the Chiltern District Council Portfolio Holder for Sustainable Development, Councillor Peter Martin.</p> <p>The response of the South Bucks District Council Portfolio Holder for Sustainable Development, Councillor John Read is currently awaited at the time of sending this email. If there are any changes to this response in the light of comments which he may wish to make I will contact you straight away.</p> <p>18 – Types of accommodation needed</p>

	Gypsies and travellers are referred to in paragraphs 6.3.15 – 6.3.23 of the consultation document in terms of potential policy options which will be explored once the evidence base on traveller needs has been updated. The Councils would like to be kept informed of the outcome of this work, particularly in order to explore whether there are opportunities to meet needs from Chiltern/South Bucks. Full doc attached to Q46
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO7461
<b>Full Name</b>	Mr Robert Scott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Finally I am concerned that the Council will simply focus on 'ticking boxes' to satisfy government requirements for increasing the number of dwellings and affordable housing numbers. Whilst it is easier to achieve the targets through high density apartment blocks and 1 or 2 bed units, there is a desperate need for quality family homes particularly in Hemel Hempstead. This is adversely effecting the demographics of the area, driving families away and having knock on effects, including the viability of quality retailers businesses in the town centre.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO7860
<b>Full Name</b>	Dr Peter Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO7944
<b>Full Name</b>	Mr Norman Groves
<b>Company / Organisation</b>	
<b>Position</b>	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I would like to confirm that I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG RESPONSE TO Q18</p> <p><input type="checkbox"/></p> <p>Berkhamsted is identified as having high proportion of older population –needs provision for specialist accommodation in plans –needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</p> <p><input type="checkbox"/></p> <p>Berkhamsted has limited provision for one-person accommodation –needs to be addressed in plans.</p>
Include files	
Number	Question 18
ID	LPIO7990
Full Name	Mr Michael Nidd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>No comment</b></p>
Include files	
Number	Question 18
ID	LPIO8270
Full Name	Mrs Thacker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>On another note, all the these houses that will be built will largely be bought up by investors looking to rent, it causes this knee jerk reaction constantly that we have to build more houses than what this country really needs. That is something for the government to look into if they</p>



	really want to sort out this (supposed) housing crisis.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO8440
<b>Full Name</b>	Mr Peter Shell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Because of the above I am not in a position to myself provide detailed answers to all the questions, but have seen the response prepared by BRAG and agree with their comments which should also be regarded as my own.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO8540
<b>Full Name</b>	Mrs Sarah Rees
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p>

	<p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP108567
<b>Full Name</b>	Helen & Stuart Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action group have responded in full to the issues and options consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation the we wish DBC to duplicate BRAG's responses under our name.</b></p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP108616
<b>Full Name</b>	Spencer Holmes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO8663
Full Name	MRS G RUSSELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No</p> <p>1- What is needed for many older people is not special housing, but smaller quality properties, so they can downsize if they wish, releasing larger properties.</p> <p>2- For older residents and young families there should be a larger percentage of small houses with gardens and parking, not just apartments.</p>
Include files	
Number	Question 18
ID	LPIO8704
Full Name	MR NIGEL EGERTON-KING
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Berkhamsted needs more homes for old people near the town centre.

Include files	
Number	Question 18
ID	LPIO8730
Full Name	Mrs Pat Berkley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG's responses under my/our name.</b></p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO8829
Full Name	Mr Lawrence Sutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p>

	<ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO8995
<b>Full Name</b>	David Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO9018
<b>Full Name</b>	Mrs Susan Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO9199
<b>Full Name</b>	Rob & Julie Wakely
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The draft Dacorum Local Plan fails to show:</p> <ul style="list-style-type: none"> <li>how to meet the desperate need for more affordable and social housing for our young people, as well as the teachers, NHS staff, carers and other workers we need in this community;</li> </ul>

	<ul style="list-style-type: none"> <li>• how to ease the pressure on this part of Dacorum's creaking infrastructure (public transport, cycling and walking, roads, parking, schools and playgrounds, GPs, drains, water and utilities) from recent housing developments, let alone the demands of further housing development;</li> <li>• how further housing development is consistent with the stated aim to protect and enhance what local people love about where we live;</li> <li>• how the community can be guaranteed that new housing will be developed sustainably meeting the highest environmental standards; or</li> <li>• how development will avoid associated traffic worsening air pollution and road safety in Berkhamsted, Northchurch and Tring.</li> </ul> <p>We are opposed to the draft Dacorum Local Plan and the Options proposed which would all mean the sacrifice of greenbelt land. We are calling for Dacorum Borough Council to present a draft Plan which is genuinely designed to meet the needs of Berkhamsted, Northchurch and Tring, in particular:</p> <ul style="list-style-type: none"> <li>• greenbelt land only allocated for development where guaranteed more than 50% genuinely affordable housing (and at least half of that to be social housing)</li> <li>• increased provision of sheltered and extra care housing for older residents</li> <li>• increased provision of 1 and 2 bedroom flats for younger residents</li> <li>• commitment to a thorough assessment of the infrastructure needs of each community and active planning to meet those needs ahead of further development</li> </ul> <p>all future development to be subject to strict environmental and sustainability standards, including limiting traffic growth and enhancing road safety</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO9726
<b>Full Name</b>	Jeremy Bonnar
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Please provide a breakdown of the extra provision of over 55 accommodation. New families will have associated elderly family members who will need to be housed nearby
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO9763

Full Name	Aly MacLean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO9811
Full Name	Mr Paul Wardle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p>

	<p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP109986
<b>Full Name</b>	mr Kevin Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP1010034
<b>Full Name</b>	Jill Mewha
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10103
<b>Full Name</b>	Melanie Frankel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist</li> </ul>

	<p>accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</p> <ul style="list-style-type: none"> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10151
<b>Full Name</b>	Natalie Crane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> </ul> <p><b>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</b></p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10208
<b>Full Name</b>	Mr Tim Beeby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as</p>

	<p>confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>....</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10255
<b>Full Name</b>	John and Jane Beeley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>.....</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10305
<b>Full Name</b>	Kathleen Lally
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing in response to the latest plan for housing development in Berkhamsted, most of which suggests an excessive and impractical number of new houses. I have read your Local Plan 2017 and I have read the reply of Berkhamsted Residents' Action Group (BRAG) and agree that <u>Option 1B is the only option acceptable</u>.</p> <p>I agree entirely with the BRAG response to your plan.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10353
<b>Full Name</b>	J&P Savage
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Secondly, the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

	<p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10419
<b>Full Name</b>	Mr Daniel Parry
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10468
<b>Full Name</b>	David Burbidge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, <b><u>I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</u></b></p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10518
<b>Full Name</b>	Mr Stephen Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>I would however like to make a few specific comments.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10566
<b>Full Name</b>	Mr Roger Petts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10613
<b>Full Name</b>	Simon Chilton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p>

	<p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10663
<b>Full Name</b>	Sally and David Williams
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please register as support for BRAG's submission.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10711
<b>Full Name</b>	Mrs Jenny Jenkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p>



	<p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10756
<b>Full Name</b>	Taylor Wimpy Strategic Land
<b>Company / Organisation</b>	Taylor Wimpy Strategic Land
<b>Position</b>	C/O Pegasus Group
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>In respect of specialist accommodation the Council has assessed its need separately from its general housing needs, which we support. It is important that once the standardised housing methodology takes effect, the Council continues to assess and identify its need for specialist accommodation separately from general housing to ensure this need is properly met through the Local Plan.</p> <p>For full response please see question 46.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10768
<b>Full Name</b>	Mrs J Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18

<b>ID</b>	LPIO10804
<b>Full Name</b>	Grant Imlah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Moreover i am aware that The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10857
<b>Full Name</b>	Sheila Dawkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have studied the above plan, accessed the BRAG website, and attended the Berkhamsted Citizens Association Visioning Evening on 15 November and the Berkhamsted Town Council presentation on 22 November.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's</p>

	<p>responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10905
<b>Full Name</b>	Jean Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO10954
<b>Full Name</b>	Christopher Stafford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p>

	<p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11005
<b>Full Name</b>	Mrs Patti Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response</b></p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11051
<b>Full Name</b>	J M Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11132
<b>Full Name</b>	Cally Emmas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11179
<b>Full Name</b>	Mr Neil Aitchison
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes but subject to market considerations.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11226
<b>Full Name</b>	Jon Rollit
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<p><b>Your response - Please add your response here</b></p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 18</p>
<p><b>ID</b></p>	<p>LPIO11276</p>
<p><b>Full Name</b></p>	<p>Kate Locke</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>Yes</p>
<p><b>Your response - Please add your response here</b></p>	<p>In addition I would reiterate the extensive points made in the BRAG response to the 'Issues &amp; Options' consultation. I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. The Berkhamsted Residents Action Group (BRAG) has responded in full.</p> <p>In addition, I like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 18</p>
<p><b>ID</b></p>	<p>LPIO11364</p>

Full Name	Ms Lorraine Gilmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>BRAG has responded in full to the 'Issues &amp; Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish Dacorum Borough Council (DBC) to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasise some of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO11413
Full Name	Conian
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.</p> <p>....</p>

	<p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11485
<b>Full Name</b>	Mr Alan Ledger
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Berkhamsted needs more homes for old people near the town centre.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11523
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Agree there needs to be provision for more housing for older people.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11602
<b>Full Name</b>	Janet and James Honour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18
ID	LPIO11757
Full Name	Edmund Hobley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>...</p> <p><b>Brag Response to question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to</li> </ul>

	<p>centre and not reliant on car travel, cycling or walking up steep hills etc</p> <ul style="list-style-type: none"> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11907
<b>Full Name</b>	Janet Mason
<b>Company / Organisation</b>	Berkhamsted Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Berkhamsted is identified as having a high proportion of older population and so there is a need for the provision of specialist accommodation which should be close to the town centre and not reliant on car travel, cycling or walking up steep hills.</p> <p>Para 6.3.26 of the Strategic Housing Market Assessment [SHMA] refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. Such provision and its phasing should be reconsidered.</p> <p>Berkhamsted has limited provision for one-person accommodation – this needs to be addressed in plans.</p> <p>DBC should set proportional targets for specific types of accommodation. E.g. following the recommended housing mix in the SW Herts. Strategic Housing Market Assessment, viz. : 15% 1-bed; 30% 2-bed; 40% 3-bed and 15% 4+ -bed.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO11954
<b>Full Name</b>	Dee Sells
<b>Company / Organisation</b>	Markyate Parish Council
<b>Position</b>	Parish Clerk/ RFO
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes

	<i>It is important to locate the specific types of housing appropriately. In particular elderly persons who need to move into a Care Home or sheltered accommodation do not need the extra isolation from the community they have been living in.</i>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12054
<b>Full Name</b>	David Wilyman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Standard BRAG response to Question 18. Please note full document is attached to Question 46</p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12146
<b>Full Name</b>	Ray Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as</p>

	<p>confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Standard BRAG response to Question 18. Please note full document is attached to Q46.</p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12210
<b>Full Name</b>	Douglas & Christina Billington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12289
<b>Full Name</b>	Richard Frankel
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Standard BRAG response to Question 18. Please note full document is attached to Question 46.</p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12350
<b>Full Name</b>	Mr Brian Kazer
<b>Company / Organisation</b>	Tring in Transition
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>No</b></p> <p>Specialist care for older persons. Two sites in Tring, land north of Western Road, and Akeman Street, would be ideal for sheltered housing. Akeman Street is in the town centre, a very short distance to post office, food shops etc. The area on the north side of Western Road is a very short distance to the Tring Health Centre, a pharmacy and a small convenience store. The Tring sites Tr-h1 to Tr-h6 inclusive are too far from essential services for older persons as they get to reduced mobility. Tr-h5 is least problematic in this regard.</p> <p>We would support the provision of a new residential/dementia/nursing care facility (all three needs under one roof) in Tring as a condition of planning at phase 1, with site Tr-h5 being optimal site as it is much the nearest site to key services and bus route.</p>

	<p>Accessible housing. At least 10% of new dwellings should be built to Building Regs M4(3) "Wheelchair user dwellings".; all other dwellings built to meet Building Regs M4(2) "accessible and adaptable dwellings"</p> <p>Specialist older person housing, especially sheltered accommodation and residential homes, needs either to be very near, and well connected with, regular bus service, or be very close to social infrastructure especially doctors surgery/health centre pharmacy.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12433
<b>Full Name</b>	Judy Halden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Standard BRAG response to Question 18. Please note full document is attached to Question 46.</p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12481
<b>Full Name</b>	Meenakshi Jefferys
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO12528
Full Name	Mrs Jane Barrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Standard BRAG response for Question 18. Please note full document is attached to Question 46.</p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> </ul>

	<ul style="list-style-type: none"> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12577
<b>Full Name</b>	mr paul healy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12627
<b>Full Name</b>	Merrick Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p>



	<p>However, I would like to take this opportunity emphasise just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12676
<b>Full Name</b>	Monika & Casper Gibilaro
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under our name</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12724
<b>Full Name</b>	Lorna Ginn
<b>Company / Organisation</b>	
<b>Position</b>	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO12773
Full Name	Mr Raymond Phipps
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12820
<b>Full Name</b>	Ingrid Carola McKenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12868
<b>Full Name</b>	Mr Stephen Lally
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p>

	<p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12922
<b>Full Name</b>	Jon Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO12971
<b>Full Name</b>	Edward Keane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO13020
Full Name	Bettina Deuse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>...</p> <p><b>BRAG response to question 18 below (full BRAG response see question 46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>

Include files	
Number	Question 18
ID	LPIO13073
Full Name	Mr Paul Tinworth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO13121
Full Name	Hilary Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p>

	<ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO13187
<b>Full Name</b>	Mr J G Botha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	(Part of comment removed) Elderly accommodation is well catered for with a new home being built at the bottom of Langley Hill. We have no need for more as this will have a detrimental effect on the age dynamics of the village.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO13382
<b>Full Name</b>	Mrs Christine Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO13383
<b>Full Name</b>	Mr Alan Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO13455
<b>Full Name</b>	Mrs Catherine Imber
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO13503
<b>Full Name</b>	Deborah Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this</p>



	<p>as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP1013558
<b>Full Name</b>	Mr Alan O'Neill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation.</p> <p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP1013611
<b>Full Name</b>	Sue O'Neill

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO13673
Full Name	Tim Uden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p>

	<ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO13738
<b>Full Name</b>	Edward Hatley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO13788
<b>Full Name</b>	Mr Roger Didham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<p><b>Your response - Please add your response here</b></p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 18</p>
<p><b>ID</b></p>	<p>LP1013843</p>
<p><b>Full Name</b></p>	<p>Alex Dann</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>Yes</p>
<p><b>Your response - Please add your response here</b></p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<p><b>Include files</b></p>	

Number	Question 18
ID	LPIO14013
Full Name	Danny Jennings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum's Local Plan.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO14062
Full Name	Mr John Goffey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response to the DBC <i>Issues and Options</i> document. We would, in addition, like to add the following points concerning Question 33 of the above document.</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p>

	<ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14110
<b>Full Name</b>	Sue Elleray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>..</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14161
<b>Full Name</b>	Mr Richard White
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

Your response - Please add your response here	<p>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO14303
Full Name	Ms Vicky Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO14421
Full Name	Ray Tattle
Company / Organisation	
Position	
Agent Name	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14439
<b>Full Name</b>	Giselle Okin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>



<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14488
<b>Full Name</b>	Mr David Griffin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</i></p> <p><i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i></p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14765
<b>Full Name</b>	Ms Paula Farnham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues &amp; Options' consultation. I could make similar comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p>

	<p>However, I would like to take this opportunity to emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14836
<b>Full Name</b>	Bev Mckenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p><b>In addition, I draw attention to some of the most important points within that response</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14883
<b>Full Name</b>	Mr Michael Curry
<b>Company / Organisation</b>	Tring Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Paragraph 6.3.19 The existing strategy CS22 with regard to the provision of Gypsy & Traveller sites in the Core Strategy is too simplistic. There is no attempt to match the supply of pitches to where the demand is. That standalone sites are difficult to secure does not mean that this is the right policy to follow. The existing policy should not be carried forward.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14939
<b>Full Name</b>	Malcolm and Jill Allen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO14988
<b>Full Name</b>	Mr Clive Freestone
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15038
<b>Full Name</b>	Mr & Mrs D A Simmons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. We request you accept this summary as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p>

	<p>We would like to take this opportunity to emphasize a few of the most important points within that response, <b><i>in particular our response to Q25.</i></b></p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15103
<b>Full Name</b>	Grand Union Investments
<b>Company / Organisation</b>	Grand Union Investments C/O Savills
<b>Position</b>	Associate Director
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• In terms of the types of housing that the Council plans for, the NPPF requires at paragraph 50 that local planning authorities should '<i>identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand</i>'. As such, the Council's SHMA should form the basis of the Council's approach to the size, type, tenure and range of housing that it should plan for. In broad terms, the SHMA recommends planning for larger sized open market homes and smaller sized affordable homes. The Council says at paragraph 3.5 of the consultation document that '<i>our past experience suggests that larger greenfield sites are more likely to provide opportunities for family sized homes than brownfield sites in our towns and villages</i>'. Savills own analysis accords with the Council's perspective on this matter. However, the housing market is dynamic and any policy prescription on housing mix should be sufficiently flexible to allow for new up to date evidence to be taken account at the time that planning applications come forward.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15149
<b>Full Name</b>	Mr David Broadley
<b>Company / Organisation</b>	Aylesbury Vale District Council

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Issue 10 - What type of homes do we need to plan for?</b></p> <p>p.50 - It is understood that a site (LA5) was intended to have traveller pitch(es) on it but these were not carried forward into the Adopted Site Allocations plan. It is understood from para 6.3.18 that a new traveller accommodation assessment has been commissioned so AVDC would be interested in how much and where the capacity is to be found.</p> <p>P.49 - para 6.3.10 - This states the SHMA doesn't recommend an affordable housing target and the Council will carry on an established threshold of using 35-40%. It is queried how this fits with the Housing White Paper 2016 revised definition of affordable housing and also the Housing and Planning Act 2016 introducing starter homes into the definition of affordable housing?</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15225
<b>Full Name</b>	Sue Tiley
<b>Company / Organisation</b>	Welwyn Hatfield Borough Council
<b>Position</b>	Planning Policy and Implementation Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We note that together with Watford Borough Council, you are in the process of updating your Gypsy and Traveller Accommodation Assessment (GTAA). If this new assessment indicates that further new pitches need to be provided, then you propose to carry forward the general approach of seeking new sites alongside major new housing developments. Welwyn Hatfield has taken a similar approach where it has not been possible to meet all its identified need on standalone sites.</p> <p>No specific mention is made in your consultation document of Transit provision. The only (public) Transit site in Hertfordshire is located at South Mimms (within the borough of Hertsmere). This site serves the whole of Hertfordshire. Please note that the WHBC Gypsy Traveller and Travelling Showpeople Accommodation Needs Assessment (2016) has made an allowance for one pitch to be provided in Welwyn Hatfield to address a need for accommodation arising from this Transit site. Welwyn Hatfield would welcome a similar consideration within the Dacorum and Watford updated assessment in recognition of the countywide function of the Transit site. It would also welcome an ongoing dialogue (on a</p>

	countywide basis) on the approach to transit provision to help facilitate travelling within the community on authorised sites.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15265
<b>Full Name</b>	Caroline Manson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18: Do you agree with the proposed approach to planning for specific types of housing?</b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15317
<b>Full Name</b>	Mr Alan Conway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues &amp; Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15366
<b>Full Name</b>	Sue Wolstenholme
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p><b>Standard BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to</li> </ul>



	<p>centre and not reliant on car travel, cycling or walking up steep hills etc</p> <ul style="list-style-type: none"> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15428
<b>Full Name</b>	Nick Hanling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15476
<b>Full Name</b>	Sarah and Nigel Tester
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation</p>

	<p>and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP1015532
<b>Full Name</b>	Miss Tanya Assarat
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	

Number	Question 18
ID	LPIO15581
Full Name	Melanie Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18
ID	LPIO15648
Full Name	Mr James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to</li> </ul>

	<p>centre and not reliant on car travel, cycling or walking up steep hills etc</p> <ul style="list-style-type: none"> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15707
<b>Full Name</b>	Mark Pawlett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15755
<b>Full Name</b>	Maria & Colin Sturges
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</b></p>

	<p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO15802
<b>Full Name</b>	David Kerrigan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16060
<b>Full Name</b>	Dave Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16114
<b>Full Name</b>	Helen and Aaron Talbot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16173
<b>Full Name</b>	Stuart Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals

	<p>and lack of concern about what it will do to the infrastructure of the town.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16230
<b>Full Name</b>	Stuart Mears
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</p> <p><b>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16291
<b>Full Name</b>	Kitty Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>please find the attached report written on mine and other residents request.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p>

	We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16353
<b>Full Name</b>	Aaron Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I support GFRA responses see below.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16400
<b>Full Name</b>	Ruth and Stephen Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</b></p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p>



	<p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16466
<b>Full Name</b>	Andrew Yeomans
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16542
<b>Full Name</b>	Ian Emmas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p>

	<p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>. Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>. Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16825
<b>Full Name</b>	Jon G. Wright Dawn Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16893
<b>Full Name</b>	Jan Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p>

	We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO16981
<b>Full Name</b>	Chris Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17038
<b>Full Name</b>	Jade Holmes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield</p>

	land that can significantly contribute to any housing allocation afforded to it.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17095
<b>Full Name</b>	Grahame Senior
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17134
<b>Full Name</b>	D. Phillips
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I fully concur with the comments attached from BRAG. The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p>

	<ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17228
<b>Full Name</b>	Debbie Crooks Pam Moss
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17285
<b>Full Name</b>	Margaret and Andrew Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

Your response - Please add your response here	<p>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18
ID	LPIO17342
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>...</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
Include files	
Number	Question 18
ID	LPIO17394
Full Name	Lesley Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 18 below (copy of full response attached to question 46)</p> <p><b>Do you agree with the proposed approach to planning for specific types of housing?</b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills</li> <li>• Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost ‘step down’ beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> <li>• Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
Include files	
Number	Question 18
ID	LPIO17449
Full Name	Sara Bell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that</p>

	such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17508
<b>Full Name</b>	Emma Talbot
<b>Company / Organisation</b>	The Little Cloth Rabbit
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please find attached a report (GFRA) about the proposed development of Tring.</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p> <p>...</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17556
<b>Full Name</b>	MR DAVID BROWN
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 18 below (copy of full response attached to question 46)</p> <p><b><i>Do you agree with the proposed approach to planning for specific types of housing?</i></b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to</li> </ul>



	<p>centre and not reliant on car travel, cycling or walking up steep hills</p> <ul style="list-style-type: none"> <li>• Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> <li>• Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17615
<b>Full Name</b>	Paul Hembury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning &amp; Development details my concerns comprehensively.</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17689
<b>Full Name</b>	Michael and Jill Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
Include files	
Number	Question 18
ID	LPIO17738
Full Name	Diana Woodward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express.</p> <p>BCA response to Question 18 below - full document attached to Question 46</p> <p><b><i>Do you agree with the proposed approach to planning for specific types of housing?</i></b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills.</li> <li>• Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost ‘step down’ beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will</li> </ul>

	<p>avoid being wholly reliant on national housebuilders for large sites.</p> <ul style="list-style-type: none"> <li>• Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17794
<b>Full Name</b>	John and Helen Osborne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17852
<b>Full Name</b>	David and Jane Elsmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO17910
<b>Full Name</b>	Dave Davies
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18019
<b>Full Name</b>	mr Richard Lambert
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMEMNT) , my own views can be summarised in a handful of bullet point.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18090
<b>Full Name</b>	Mr Graham Bright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18147
<b>Full Name</b>	Peter and Cathy Davidson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18204
<b>Full Name</b>	Nicky and Dave Hulse

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
Include files	
Number	Question 18
ID	LPIO18257
Full Name	Gail Skelton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	

Number	Question 18
ID	LPIO18317
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
Include files	
Number	Question 18
ID	LPIO18485
Full Name	Melanine Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO18531

Full Name	Mrs Juliet Chodzko
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.</b></p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18
ID	LPIO18578
Full Name	Captain Andrew Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</b></p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18



<b>ID</b>	LPIO18624
<b>Full Name</b>	Lindy Weinreb
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><i>Do you agree with the proposed approach to planning for specific types of housing?</i></b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills.</li> <li>Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost ‘step down’ beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> <li>Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18671
<b>Full Name</b>	Hilary Abbott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p>

	<p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18717
<b>Full Name</b>	Paul and Gillian Jenkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18763

Full Name	Berkhamsted Citizens
Company / Organisation	Berkhamsted Citizens
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b><i>Do you agree with the proposed approach to planning for specific types of housing?</i></b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills.</li> <li>Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost ‘step down’ beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> <li>Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
Include files	
Number	Question 18
ID	LPIO18811
Full Name	Lyndsay Slater
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p>

	<p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18859
<b>Full Name</b>	Andrew and Margit Dobbie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO18905
<b>Full Name</b>	Katherine Cassels
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</b></p> <p>...</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18
ID	LPIO18983
Full Name	Mrs Emma Robertson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Please find attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</b></p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
Include files	
Number	Question 18
ID	LPIO19046
Full Name	Barbara Gainsley

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</p> <p>Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.</p> <p>Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.</p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills.</li> <li>• Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</li> <li>• Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19103
<b>Full Name</b>	Bill Ahearn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I wish to register my objections to some of the proposals under consideration on the grounds they are simply to excessive and feel a more moderate scheme as set out in the attached report would be suitable

	<p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19161
<b>Full Name</b>	Ms Sarah Hain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19219
<b>Full Name</b>	Grove Fields Residents Association
<b>Company / Organisation</b>	Grove Fields Residents Association
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of</p>

	<p>the 11th December 2017, this submission represents the position of all 325 members.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19276
<b>Full Name</b>	Marcus, Jane, Abigail and Jennifer Fox
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Our family ( 4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town's infrastructure. We feel strongly that green belt land should be preserved for future generations</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19308
<b>Full Name</b>	Richard House
<b>Company / Organisation</b>	Gladman Development Limited
<b>Position</b>	Policy Planner
<b>Agent Name</b>	
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Gladman considers that the Local Plan should deliver a wide range in housing types to cater for all sections of the community.</p> <p>In particular, the provision of specialist housing to meet the needs of older people is of increasing importance and the Council need to ensure that this is reflected through a positive policy approach within the Local Plan Review. The Council need a robust understanding of the scale of this type of need across the District in order to be able to provide an appropriate policy/ allocations.</p> <p>Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including residents' lounge, library, dining room, guest suite, quiet lounge, IT suite, assisted bathroom, internal buggy store and changing facilities, reception and care managers office and staff facilities.</p> <p>Given the existing evidence in relation to ageing populations, and the national strategy in relation to housing for older people, Gladman recommends that the Local Plan should include a specific policy in relation to the provision of specialist accommodation for older people.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19330
<b>Full Name</b>	Stuart, Miranda & Melissa Kay
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p>

	<p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19378
<b>Full Name</b>	Wai Tang and Greg Barfoot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please note we are aware that the Berkhamsted Residents Action Group (BRAG) has responded in full to the "Issues &amp; Options" consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.</p> <p>We wish to add our concerns to the DBC local plan issues and options consultation.</p> <p>We are particularly concerned about the following</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19426
<b>Full Name</b>	Philippa Jones
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan</p> <p><b>Question 18</b>  <b><i>Do you agree with the proposed approach to planning for specific types of housing?</i></b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills.</li> <li>• Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost ‘step down’ beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</li> <li>• Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19481
<b>Full Name</b>	John Wignall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield</p>

	land that can significantly contribute to any housing allocation afforded to it.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19538
<b>Full Name</b>	Kevin Cullen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please refer to the attached report.(BRAG)</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19596
<b>Full Name</b>	Mark Lawson and Sharon Wilkie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that.</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield</p>

	land that can significantly contribute to any housing allocation afforded to it.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19652
<b>Full Name</b>	Vivienne Inmonger
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19711
<b>Full Name</b>	John Inmonger
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that</p>

	such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19765
<b>Full Name</b>	Ben Barth
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p><b>Question 18</b></p> <p><b><i>Do you agree with the proposed approach to planning for specific types of housing?</i></b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills.</li> <li>• Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost ‘step down’ beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</li> <li>• Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO19834
<b>Full Name</b>	Jon Esson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it</p>
Include files	
Number	Question 18
ID	LPIO19918
Full Name	Chris Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA )</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
Include files	
Number	Question 18
ID	LPIO19975
Full Name	mrs sue van rhee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

<b>Your response - Please add your response here</b>	<p>Please find attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20032
<b>Full Name</b>	Kate and Ben Marston
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20089
<b>Full Name</b>	Maurice and Christine O'Keefe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No



<b>Your response - Please add your response here</b>	<p>We are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20146
<b>Full Name</b>	Sherry and Haydn Bond
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20204
<b>Full Name</b>	Dianne Pilkington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	To whom it may concern,

	<p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20252
<b>Full Name</b>	Mr Peter Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20307
<b>Full Name</b>	David Clarke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20365
<b>Full Name</b>	Deborah Turnbull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p>I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20413
<b>Full Name</b>	Jane Collis
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20474
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p>I am writing in response to the Issues and Options consultation.</p> <p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP1020522
<b>Full Name</b>	DR Brigitta Case
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the <b>Berkhamsted Citizens’ Association</b> and the <b>Berkhamsted Residents Action Group</b>. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p>

	<ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul> <p>Berkhamsted Citizens response</p> <p><b><i>Do you agree with the proposed approach to planning for specific types of housing?</i></b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills</li> <li>Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost ‘step down’ beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> <li>Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20569
<b>Full Name</b>	Christine Manning
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><b><i>Do you agree with the proposed approach to planning for specific types of housing?</i></b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to</li> </ul>

	<p>centre and not reliant on car travel, cycling or walking up steep hills</p> <ul style="list-style-type: none"> <li>• Para 6.3.26 refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. The provision and its phasing should be reconsidered</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> <li>• Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20641
<b>Full Name</b>	Jane Hawkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20697
<b>Full Name</b>	Keiron Wybrow
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20745
<b>Full Name</b>	Christopher Townsend
<b>Company / Organisation</b>	
<b>Position</b>	Councillor, Tring Town Council
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)</p> <p>Paragraph 6.3.19 The existing strategy CS22 with regard to the provision of Gypsy &amp; Traveller sites in the Core Strategy is too simplistic. There is no attempt to match the supply of pitches to where the demand is. That standalone sites are difficult to secure does not mean that this is the right policy to follow. The existing policy should not be carried forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20793
<b>Full Name</b>	Usha Kilich
<b>Company / Organisation</b>	Northchurch Parish Council
<b>Position</b>	Parish Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Yes</b>, but 6.3.24 / 6.3.27</p> <p>There is a need for residential care homes which would ideally be located in the centre of Northchurch or Berkhamsted. The proposed site Be-h8 which is quite remote would require a shuttle bus service to allow residents without access to a motor car a link with the village / town.</p>
Include files	
Number	Question 18
ID	LPIO20839
Full Name	Mr Iain Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>      <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18
ID	LPIO20915
Full Name	Mr Jake Storey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I live in Berkhamsted and have witnessed the size of the small town growing in an unsustainable manner. As a

	<p>result I joined SYBRA and also now BRAG. I have attached the BRAG response to your proposals</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO20970
<b>Full Name</b>	Mr & Mrs J.D Battye
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents' Action Group (BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG's responses under our names so that a complete repetition of BRAG's submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council's submission.</p> <p>Q18 BRAG</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul> <p><b>Berkhamsted Town Council response</b></p>

	<p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p>Berkhamsted is identified as having a high proportion of older population and so there is a need for the provision of specialist accommodation which should be close to the town centre and not reliant on car travel, cycling or walking up steep hills.</p> <p>Para 6.3.26 of the Strategic Housing Market Assessment [SHMA] refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. Such provision and its phasing should be reconsidered.</p> <p>Berkhamsted has limited provision for one-person accommodation – this needs to be addressed in plans.</p> <p>DBC should set proportional targets for specific types of accommodation. E.g. following the recommended housing mix in the SW Herts. Strategic Housing Market Assessment, viz. : 15% 1-bed; 30% 2-bed; 40% 3-bed and 15% 4+ -bed.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21055
<b>Full Name</b>	julie owen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21120
<b>Full Name</b>	Sheron Wilkie
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p><b>GFRA Response to Question 18, full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
Include files	
Number	Question 18
ID	LPIO21164
Full Name	St Albans Diocesan Board of Finance
Company / Organisation	St Albans Diocesan Board of Finance
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> <li>SADBF recognise the issues associated with an ageing population and support the provision of housing to target the specific needs of groups within the population</li> </ul>
Include files	
Number	Question 18
ID	LPIO21196
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <p>Berkhamsted is identified as having high proportion of older population and needs provision for specialist</p>

	<p>accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</p> <p>Berkhamsted has limited provision for one-person accommodation which needs to be addressed in plans. Sites on ridge tops or at a distance from the centre will not meet this need – increased urban density is a more rational approach</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21319
<b>Full Name</b>	Antony Harbidge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b>     <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21365
<b>Full Name</b>	Helen Kington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21437
<b>Full Name</b>	Mr R Smith and Mr A Lyell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	1.19.1 The Landowners recognise the issues associated with an ageing population and support the provision of housing to target the specific needs of groups within the
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21447
<b>Full Name</b>	Majesticare Limited
<b>Company / Organisation</b>	Majesticare Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>32. We strongly support of the proposed approach to planning for specific types of housing, and specifically the focus on specialist accommodation for older persons and nursing care accommodation. The Issues and Options consultation is relying on data from 2013, in which the 2013 Strategic Housing Market Assessment (SHMA) estimates that the borough needs to make provision for an average of 72 homes per year for specialist accommodation for the elderly as part of the overall housing need. However, the 2016 SHMA, which has the most up to date figures publicly available projects that the population of the borough aged 75+ will increase by 9,711 by 2036. This equates to a provision an average of 82 specialist units for the elderly to be provided based on 170 units per 1,000 people aged 75+. We have identified that within a 10 minute drive-time catchment area of Shootersway, there is an under-supply of 89 market standard (en suite) beds. Should the site at Spring Garden Lane be allocated, it can assist in providing for this under-supply by delivering a high quality care home facility.</p> <p>33. As well as the provision of specialist housing for the elderly, residential extra-care and nursing care provision was analysed separately to general housing need within the SHMA. The 2016 SHMA concluded that Dacorum has an overall need for 688 additional residential extra-care and nursing care bed spaces between 2016 and 2036, which equates to 30 new bed spaces each year.</p> <p>34. It is crucial that the new Local Plan responds to increasing demand and allocates specialist sites suitable for delivering specialist care homes, alongside the delivery of specialist care units within mixed use developments. This allocation of specific sites for specialist accommodation will contribute to the soundness of the plan with the Framework that states at Paragraph 50 that local planning authorities must plan for a mix of housing based on current and future demographic trends, including housing for older people and people with disabilities. The site at Spring Garden Lane is able to assist in reaching this national objective.</p> <p>35. The site at Spring Garden Lane can deliver a high quality nursing and care home, that can respond to this growing demand across the borough. The site is only constrained by the landscape designations and not by any physical constraints that would restrict the availability and deliverability of the development. Given the growing demand for specialist accommodation across the borough, this site should be allocated within the new Local Plan for development.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21463
<b>Full Name</b>	Audley Court Ltd
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>33. We strongly support the proposed approach to planning for specific types of housing across the borough, and in particular the focus on specialist accommodation for the elderly, of which there is an increase in need. Within the Issues and Options consultation documents, it states: <i>“the SHMA estimates that we need to make provision for an average of 72 homes per year for specialist accommodation for older people” (page 51)</i>. However this document appears to be relying on data from 2013. We have assessed the 2016 SHMA, which quotes a higher figure to that in the Issues and Options consultation documents. The 2016 SHMA projects that the population of the borough aged 75+ will increase by 9,711 by 2036 which equates to a provision an average of 82 homes for older persons to be provided annually based on 170 units per 1,000 people aged 75+.</p> <p>34. As well as the provision of specialist housing for the elderly, residential extra-care and nursing care provision was analysed separately to general housing need within the SHMA. The 2016 SHMA concluded that Dacorum has an overall need for 688 additional residential extra-care and nursing care bed spaces between 2016 and 2036</p> <p>35. The Framework also requires planning authorities to have a clear understanding of housing needs in their area, and at paragraph 159 states that local authorities should address the need for all types of housing, including affordable housing and the needs of different groups in the community such as older people</p> <p>36. Considering this annual increased need for accommodation for older persons, it is crucial for the Council to respond to this demand in the new Local Plan, and the plan should allocate specific sites to ensure adequate provision of accommodation for the elderly population, responding to paragraph 182 in the Framework that requires local plans to be based on proportionate evidence</p> <p>37. The site at Bank Mill Lane is in a suitable and sustainable location to accommodate a high quality Care Community that can assist in providing specialist accommodation for the elderly population, which can also assist in meeting the specialist housing needs of Berkhamsted and the Borough as a whole</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LP1021495
<b>Full Name</b>	Hightown Housing Association
<b>Company / Organisation</b>	Hightown Housing Association
<b>Position</b>	
<b>Agent Name</b>	



<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Question 18 Do you agree with the proposed approach to planning for specific types of housing?</b>  <b>Yes</b></p> <p>We support the recognition that schemes for specialist housing and accommodation for older persons need to be supported by the Local Plan by requiring suitable provision as part of larger housing allocations or on specific sites.</p> <p>The Local Plan should include a specific policy that encourages such development and should also consider the allocation of specific sites for such development, rather than only considering general needs housing allocations.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21521
<b>Full Name</b>	Mr Chris Briggs
<b>Company / Organisation</b>	St Albans City & District Council
<b>Position</b>	Spatial Planning Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Q.18 Housing mix – No</b>  <b>16. Housing type / mix (Para 3.5)</b></p> <p>The potential implications of Para 6.3.5 need to be fully considered and clarified. 'Our past experience suggests that larger greenfield sites are more likely to provide opportunities for family sized housing' could be misinterpreted as meaning that greenfield site densities will be low and the size of units will be large. This could lead to inefficient use of Green Belt greenfield land. Clearly overall a wide range of housing sizes and types will be required on strategic scale sites, including larger dwellings. However it is important that densities are sufficiently high to utilise land effectively and to provide the right mix of housing. Provision of smaller two and three bedroom units, in a form that facilitates this, fits well with the assessed need. It can also improve affordability and access to housing for local residents. This is an important issue for joint planning at East Hemel Hempstead.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21545
<b>Full Name</b>	Mrs Valerie Silverton
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have read the proposals and strongly agree BRAG's responses.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18
ID	LPIO21602
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p><b>GFRA Response to Question 18 , full document attached to question 46</b></p> <p>We agree with the proposed approach to planning for specific types of housing in principle, on the basis that such delivery is brought forward again in an efficient manner so as not to underuse or undervalue brownfield land that can significantly contribute to any housing allocation afforded to it.</p>
Include files	
Number	Question 18

<b>ID</b>	LPIO21689
<b>Full Name</b>	Countryside Properties (UK) Ltd
<b>Company / Organisation</b>	C/O Bidwells
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• CPOK recognise the issues associated with an ageing population and support the provision of housing to target the specific needs of groups within the population.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21745
<b>Full Name</b>	David Lang
<b>Company / Organisation</b>	Hemel Hempstead Constituency Labour Party
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>It is clear that the requirements of various areas of the Borough are very different and that many residents and families are settled in specific areas and wish for this to continue. For instance, with 32% of pensioners living alone, it is clear that in many areas older residents live in houses larger than they now require. Many would like to remain in their familiar district, but the lack of available suitable accommodation to enable downsizing into smaller or sheltered housing (for purchase or rental) is currently a bar. It is likely that further analysis can be assisted by your own statistics on house size across the Borough and by local community groups (eg LGVA in Leverstock Green) who will have at least anecdotal evidence that could be the basis of further research.</p> <p>It is stated that recent builds include a high proportion of flats, with two-thirds of new builds from 2006 being flats: similarly, half of new builds since 2006 were 1 and 2 bedroom dwellings. We believe it is particularly important to conduct detailed analysis to assess the needs of families with children before building more of the above. The lack of housing for local families is a significant complaint on the doorsteps of Dacorum.</p> <p>Of course the number and types of dwelling must be the choice of the Council and not developers (see below). We urge you to ensure that all properties for sale are freehold, or at the very least are not the type of leaseholdings with provision for increasing and punitive ground rents.</p>
<b>Include files</b>	

<b>Number</b>	Question 18
<b>ID</b>	LPIO21759
<b>Full Name</b>	Elizabeth Hamilton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	As someone approaching retirement age I am acutely aware of the issues around downsizing. Accommodation for retired and older persons is not just specialist accommodation.
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21885
<b>Full Name</b>	Louis Quail
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the augment for building on greenbelt land should only be one of last resort , there are plenty of other options left before launching off this one way route .</p> <p>Berkhamsted Residents Action Group response:</p> <ul style="list-style-type: none"> <li>• Yes but, Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO21922

Full Name	Roger Saller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perspective on what made the town attractive and what is now at risk.</p> <p><b>BRAG response to Question 18 (please note full document is attached to Q46)</b></p> <p><b>Question 18</b> <i>Do you agree with the proposed approach to planning for specific types of housing?</i></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans</li> </ul>
Include files	
Number	Question 18
ID	LPIO21953
Full Name	Thomas and Margaret Ritchie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council's response:</p> <p>Yes, but Berkhamsted is identified as having a high proportion of older population and so there is a need for the provision of specialist accommodation which should be close to the town centre and not reliant on car travel, cycling or walking up steep hills.</p> <p>Para 6.3.26 of the Strategic Housing Market Assessment [SHMA] refers to residential and nursing care bed</p>

	<p>spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. Such provision and its phasing should be reconsidered. Berkhamsted has limited provision for one-person accommodation – this needs to be addressed in plans.</p> <p>DBC should set proportional targets for specific types of accommodation. E.g. following the recommended housing mix in the SW Herts. Strategic Housing Market Assessment, viz. : 15% 1-bed; 30% 2-bed; 40% 3-bed and 15% 4+ -bed.</p>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO22033
<b>Full Name</b>	Gallagher Estates
<b>Company / Organisation</b>	Gallagher Estates
<b>Position</b>	
<b>Agent Name</b>	Mrs Hanna Staton
<b>Company / Organisation</b>	Pegasus Group
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>In relation to catering for the needs of older people, it is important that the line between homes and residential institutions is observed and beds in residential institutions are not included in objectively assessed housing need calculations. It would be prudent to adopt specific local plan policies with respect to the need and supply of residential institutions in the Borough.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO22133
<b>Full Name</b>	Mrs Hayley Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 18
<b>ID</b>	LPIO22177

Full Name	Mr Peter Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 18
ID	LPIO22222
Full Name	Miss Sophie Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 18
ID	LPIO22499
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Please find below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below)</b></p> <p><b>Yes but</b></p> <ul style="list-style-type: none"> <li>• Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc</li> <li>• Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.</li> </ul>
Include files	
Number	Question 18
ID	LPIO22549
Full Name	Mrs C Longbottom

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I support all answers and comments to the Issues &amp; Options Consultation document noted on the Berkhamsted Town Council website</b></p> <p><b>Yes, but</b></p> <p>Berkhamsted is identified as having a high proportion of older population and so there is a need for the provision of specialist accommodation which should be close to the town centre and not reliant on car travel, cycling or walking up steep hills.</p> <p>Para 6.3.26 of the Strategic Housing Market Assessment [SHMA] refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. Such provision and its phasing should be reconsidered.</p> <p>Berkhamsted has limited provision for one-person accommodation – this needs to be addressed in plans.</p> <p>DBC should set proportional targets for specific types of accommodation. E.g. following the recommended housing mix in the SW Herts. Strategic Housing Market Assessment, viz. : 15% 1-bed; 30% 2-bed; 40% 3-bed and 15% 4+ -bed.</p>
Include files	
Number	Question 18
ID	LPIO22619
Full Name	Mr & Mrs Mehew
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We write as residents of [REDACTED]</p> <p>[REDACTED]</p> <p>in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group</p>



(MRAG) (see comments LPIO18384, 18385) and the draft response prepared by Berkhamsted Town Council.

## Berkhamsted Town Council Response:

Berkhamsted is identified as having a high proportion of older population and so there is a need for the provision of specialist accommodation which should be close to the town centre and not reliant on car travel, cycling or walking up steep hills.

Para 6.3.26 of the Strategic Housing Market Assessment [SHMA] refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. Such provision and its phasing should be reconsidered.

Berkhamsted has limited provision for one-person accommodation – this needs to be addressed in plans.

DBC should set proportional targets for specific types of accommodation. E.g. following the recommended housing mix in the SW Herts. Strategic Housing Market Assessment, viz. : 15% 1-bed; 30% 2-bed; 40% 3-bed and 15% 4+ -bed.

Include files	
Number	Question 18
ID	LPIO22696
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<b>Question 18 – Do you agree with the proposed approach to planning for specific types of housing?</b> No comment
Include files	
Number	Question 18
ID	LPIO22803
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	No
<b>Include files</b>	

## Report Settings Summary

Event	<b>Local Plan Issues &amp; Options November 2017</b>
Total Responses	<b>22,707</b>
Total Respondents	<b>2,376</b>
Filtered Responses	<b>337</b>
Filtered Respondents	<b>329</b>
Questions	<p><b>Question 19</b></p> <p><b>Do you agree with the proposed suggested approach to the timing of site delivery?</b></p> <p><b>Yes / No</b></p> <p><i>If no, please explain what alternative approach, or changes to our current approach, you would like and why. Where possible, support your answer with reference to any evidence.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	<b>ID-4764255-QUESTION-19</b>
Pivot	<i>(none)</i>
Document Name	Question 19 - Summary Report
Created on	2019-04-18 07:35:51
Created by	Strategic Planning Admin

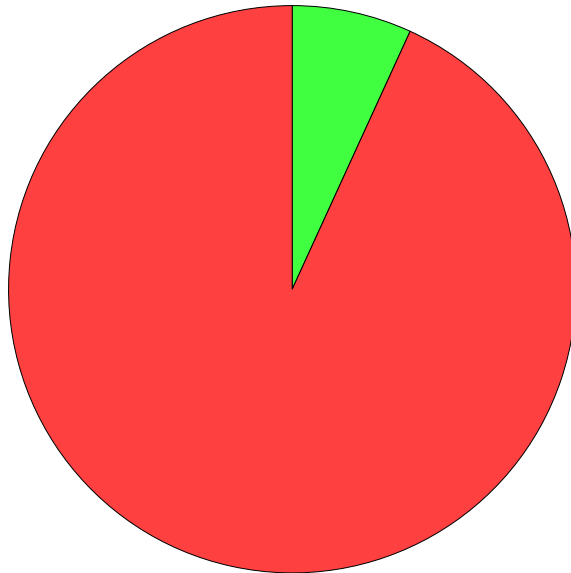
Your Opinion

Question responses: 337 (100.00%)

Question 19

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

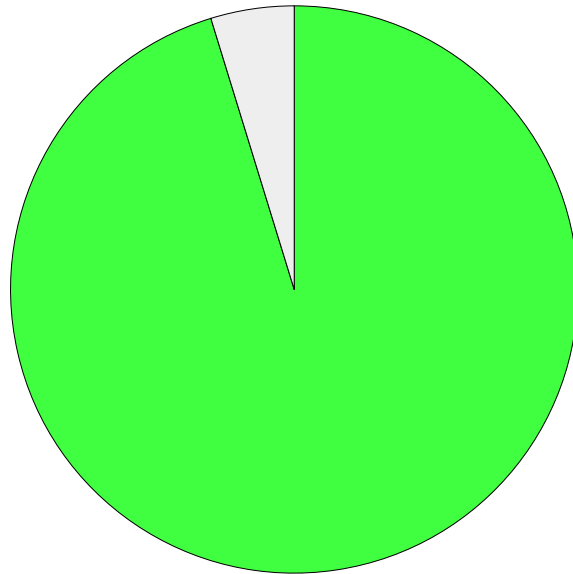
Yes / No



	% Total	% Answer	Count
Yes	6.82%	6.82%	23
No	93.18%	93.18%	314
Total	100.00%	100.00%	337

Responses

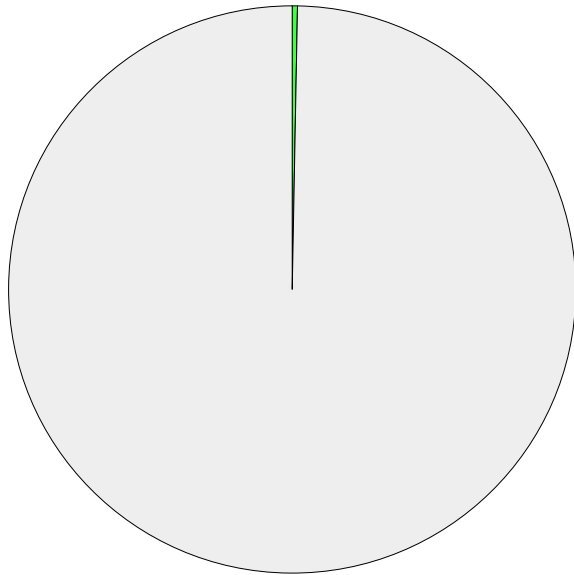
Question responses: **321 (95.25%)**



	% Total	% Answer	Count
Responses	95.25%	100.00%	321
No Response	4.75%	--	16
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>337</b>

Supporting evidence

Question responses: 1 (0.30%)



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	0.30%	100.00%	1
■ Responses with No Uploads	99.70%	--	336
Total	100.00%	100.00%	337

## Issues and Options All Responses to Question 19

<b>Number</b>	Question 19
<b>ID</b>	LPIO88
<b>Full Name</b>	Mr John Lilley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO145
<b>Full Name</b>	Mrs Lynne Head
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There are no good reasons for taking large swathes of green belt and building on them. The only winners are the greedy developers.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO181
<b>Full Name</b>	Mr John Shaw
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Development on green field sites is just the easy and cheapest solution and in certain cases very lucrative for HCC when they are the land owner. Only brown field sites should be considered for development and then developed progressively. There should be no development ever on green field sites. As stated previously green field sites have a purpose to stop the merger of settlements and urban sprawl.</p> <p>To date there has been no infrastructure provided to accommodate the large amount of development in the area.</p>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO293
<b>Full Name</b>	Ms Jane Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	You have already taken green belt land in Tring and plan to build 500 homes on it. I cannot see anything happening in terms of infrastructure improvements. Some of your plans would nearly double the size of this small market town. How would you manage traffic, parking, doctor provision and school places. I do not think green belt should be built on anywhere.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO334
<b>Full Name</b>	Mr David Stanier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Section 6.4.4 specifically mentions green field sites which can only be interpreted as green belt and working farm land ... which is not acceptable.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO397
<b>Full Name</b>	Mr Robert Spence
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The provision of housing on Green Belt land by developers for commercial gain cannot possibly be described as "exceptional circumstances" - see your paragraph5.2.2



<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO456
<b>Full Name</b>	Ms Julia Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	As previously stated, the pressure to release greenbelt land will increase once a precedent is set and there is no guarantee that there will be sufficient infrastructure provision to match.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO631
<b>Full Name</b>	Mrs Carole Stokes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Enough of our green belt and rural land has already been taken. No further development should even be considered on our remaining green spaces
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO671
<b>Full Name</b>	Mr David Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The scale for the proposed use of green belt is excessive particularly for the more extreme options 2 and 3. I would support controlled and structured building on selected green belt with associated additional infrastructure. For example in Tring, building perhaps 200 homes on Station Road linking the town to the station seems very sensible. Its all about proportionality.

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO714
<b>Full Name</b>	Mr Julian Dent
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Planning permission once granted, should be acted on within a year. Any developer failing to cut sod within a year should pay a fine of 10% of the value of the planned development. Any developer that does not complete development within 3 years should pay a fine of 25% of the value of the development. They operate a similar scheme in Singapore (very densely populated) and it works. There are no land banks...
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO867
<b>Full Name</b>	Mr Stephen Bevan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO929
<b>Full Name</b>	Ms Stephanie Knowles
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Building on greenbelt when there are many empty properties, especially in the commercial sector, is not 'exceptional circumstances'

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO956
<b>Full Name</b>	Mrs Saunders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We must try as much as possible to achieve housing targets without using any green belt land. If some green belt needs to be used, this must not be released all in one go, even if the current owners are keen to realise their profits immediately.</p> <p>As you have a plan until 2036, then infrastructure needs should be considered as a whole earlier, rather than later, even if not implemented immediately. Otherwise, if you do manage to achieve the required number of houses by many small developments, then our already inadequate infrastructure will never be updated.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1010
<b>Full Name</b>	Mr Dominic Lawrance
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>"... Our evidence is telling us that housing need is likely to substantially increase ..." Predictions of future housing need are difficult, due to immigration / emigration, which are influenced by numerous factors. The impact on Brexit on the UK's population could be significant. It would be prudent to defer assessments of future housing needs until the result of the UK's departure from the EU is clear.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1037
<b>Full Name</b>	mr Tish Seabourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>1 Agree brownfield sites must be released first but there are critical contradictions within this section.</p> <ul style="list-style-type: none"> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed.</li> </ul> <p>Building further developments adjacent to recently re-developed areas is harmful to the environment and exhausting of the services and infrastructure.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1096
<b>Full Name</b>	Ms Tish Seabourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I disagree with 6.4.4 - it will always be more attractive (and profitable) for developers to build on greenfield/Green Belt sites rather than brownfield. Brownfield sites must always be developed first - even the Government recommend this.</p> <p>Paragraph 6.4.2 is illogical since it ignores the cumulative effect of developing small to medium sites. Each single small development may only have a marginal effect on existing infrastructure, but when a number of small sites are added together the overall effect is the same as developing a big site. In fact it may be more beneficial to select larger sites and demand from developers significant infrastructure investment.</p> <p>Building additional homes close to recently developed areas would be harmful to the environment and put additional pressure on services.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1212

<b>Full Name</b>	Mr Bernard Richardson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The precedent of destroying Green Belt land will increase the pressure to use more later. The infrastructure must come first.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1269
<b>Full Name</b>	Sarah Harper
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There is no justification for releasing any Green Belt land. People live in the District because of what it is. The Council should not allow development on Green Belt by stealth.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1358
<b>Full Name</b>	Mr Andrew Calderwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Disagree particularly with 6.4.4 which directly contradicts Central Government guidance and instead adopts the property developers' line that it is easier to develop greenfield sites first. Brownfield sites should be developed first, the difficulties notwithstanding.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1565
<b>Full Name</b>	MR PETER SUMMERFIELD

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The developers of the site MUST be responsible for not only putting in the infrastructure on their site but also improving or upgrading the existing infrastructure of the local area itself.</p> <p>I totally disagree with "safeguarding" land for future development. This is called 'land banking' and it is disapproved of by Government and councils. It also blights the homes of nearby residents if they wish to sell.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1615
<b>Full Name</b>	Mrs Susan Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Brownfield sites must be developed before green field sites. Developers will always wish to develop green field before brownfield because of cost. 6.4.4 is a dangerous statement and should be removed. Green Belt release should always be a last resort, not a first call.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1638
<b>Full Name</b>	Mr John Ingleby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>6.4.4</b> "...the need to maintain a steady supply of new homes over the whole plan period and future pressures on local infrastructure that may take some time to address. However, our evidence is telling us that housing need is likely to substantially increase..."</p> <p>What need? What evidence? Forecasts based on previous economic and population growth are unreliable as Brexit approaches.</p>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1682
<b>Full Name</b>	Jenny Thorburn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Greenbelt land should be released last - once all other options are exhausted.  The release of small scale developments should also be phased as cumulatively they do affect infrastructure - and cause a lot of disruption in one area during building phase if there are several close together - Berkhamsted has had a lot of small developments in recent years and they add up to a substational change to the town.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1685
<b>Full Name</b>	Ms G Puddiphatt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	All green belt should be removed from the plan
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1745
<b>Full Name</b>	Mr Kenneth Watts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I have indicated 'No' because I am sceptical about your assertion that 'evidence is telling us that housing need is likely to substantially increase'. What evidence and where is this need coming from? I would like to see this evidence and understand who needs all the additional

	housing, particularly in/around large villages such as Kings Langley. New availability here will simply trigger incomers wishing to live in a better location with good commuting links, not particularly linking or helping to secure new jobs and encouraging economic growth within the borough. I am also worried by DBCs claim that 'many of the Green Belt sites can be delivered early and the larger ones have the ability to secure necessary key infrastructure'. This suggests DBC is already minded to pursue the policy of Green Belt development (regardless of opinions sought in this exercise) and fondly imagines they will not have fight tooth and nail to secure finance for infrastructure improvements of any meaningful nature from potential developers.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1797
<b>Full Name</b>	Mrs Pamela Kingsland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I object strongly on any development whatsoever on greenbelt land.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1879
<b>Full Name</b>	Mr Richard Case
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Agree brownfield sites must be released first but: <ul style="list-style-type: none"> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites</li> </ul>



	<p>places on the infrastructure of our towns and villages should be recognised.</p> <ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO1940
<b>Full Name</b>	Miss teresa finnigan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Preservation at all costs for the GB and any future development's infrastructure should be in place before any development begins, we are already at capacity on our road networks! If 200 homes are built each year on say a 2,000 homes site, we are looking at infrastructure in place if any, once this is completed, its just not good enough! Developers should be doing what we want, not what they want, they want their land released for development, if there proposed plans don't comply with the council's planned polices and requirements, then its a no go!</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2022
<b>Full Name</b>	Mrs Christine Mabley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>A public call for land with sites then assessed is a recipe for developers to drive planning rather than policy.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2023
<b>Full Name</b>	Mrs Christine Mabley

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Timing of developments within Dacorum's towns and villages can come forward any time unphased because of their smaller size. As long as sustainability checks are robust this seems to me the best way to ensure quick releases. The risk with larger developments is that the phasing does not guarantee the infrastructure indicated for later phases. There are no powers to enforce compliance with infrastructure phasing and what resolution can be offered if planning proposals breach other policies (national or local)?
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2165
<b>Full Name</b>	Mr Les Mosco
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Brownfield sites must be released. The cumulative effects of small to medium sites are ignored throughout this plan. Multiple small sites have already posed unbearable strain on towns like Berkhamsted. So small to medium sites can not be developed without placing significant pressure on infrastructure as they already have in Berkhamsted. The cumulative pressure of multiple small to medium sites places on the infrastructure of our towns and villages must be recognised.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2324
<b>Full Name</b>	Mr George Bull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	In connection with the maintenance of a five-year land supply at all times, there are three omissions: <ol style="list-style-type: none"> <li>1 There should be no presumption that Green Belt will be developed if it is difficult to find suitable brownfield sites.</li> <li>2 Once planning permission for residential development has been granted, there is no compulsion on the landowner to proceed with construction. There is therefore only a tenuous link between land supply and housing completions.</li> <li>3 Recent immigration figures suggest that, once the effect of Brexit has been fully felt, net immigration may drop by as much as 220,000 people per year. Housing demand should be reassessed in the light of Brexit.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2396
<b>Full Name</b>	Dr Nick Hodsdon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Land is a limited resource it is not reasonable to expect to ensure a rolling 5 year supply "at all times" Green belt land should not be made available for development Separation of the villages should be preserved Village character should not be compromised by any local infrastructure changes needed to support developments in the wider area
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2402
<b>Full Name</b>	Dr Nick Hodsdon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There should not be any development on Green Belt land. One of the drivers for housing need increasing is the building of commercial developments creating jobs filled by people from outside the area who will want to move closer to their work. This type of development should be

	restricted to those proposals that create local jobs for local people. It is not possible to comply with 6.4.5. A 5yr land supply can not sustainably be maintained. The available land will run out and the plan should acknowledge this.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2464
<b>Full Name</b>	Mr Paul Crosland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The release of Green Belt land should not be considered until all suitable brownfield land has been developed, the cost and difficulty of developing such brownfield sites notwithstanding.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2478
<b>Full Name</b>	Mr Timothy Copeman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I do not agree to the release of any green belt or urban land.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2655
<b>Full Name</b>	Mr Alan Andrews
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	No to building on any greenbelt
<b>Include files</b>	
<b>Number</b>	Question 19

<b>ID</b>	LPIO2815
<b>Full Name</b>	mrs Gillian Hooper
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Disagree strongly with 6.4.4 which directly contradicts Central Government guidance and instead adopts the property developers' line that it is easier to develop greenfield sites first. Brownfield sites should be developed as a priority.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO2873
<b>Full Name</b>	Mr Antony Harbidge
<b>Company / Organisation</b>	Berkhamsted Residents Action Group (BRAG)
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19

<b>ID</b>	LPIO2958
<b>Full Name</b>	Mr John Lunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Use all brownfield sites first. Use of greenbelt should be a last resort
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3085
<b>Full Name</b>	mr hugh siegle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>6.4.2 1 and 6.4.4 provide further indication that you are prepared to go against Government policy and public opinion and encourage development on the Green Belt. 6.4.2 should specifically exclude Green Belt land. The cumulative affect of developing smaller Green Belt sites on a town such as Berkhamsted does place significant pressure on local infrastructure.</p> <p>6.4.4 Hardly surprising that Green Belt sites can be readily delivered. It is the developers' low hanging fruit; accessible relatively easy to develop and saleable end product. This has to be resisted with greater emphasis on brownfield and urban sites and higher densities.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3113
<b>Full Name</b>	Mrs Carolyn Hill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I agree brownfield sites must be released first but there are contradictions within this section.</p> <p>4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this Plan). Each site on</p>

	<p>their own may have small effect but when combined they become unbearably large for towns like Berkhamsted and Tring. I disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</p> <p>I strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not now be abandoned.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3157
<b>Full Name</b>	Mr John Walker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3233
<b>Full Name</b>	Mr George Wheway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Appropriate infrastructure developments need to be in place before any more housing development can take place
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3283
<b>Full Name</b>	
<b>Company / Organisation</b>	Premier Property Acquisition

<b>Position</b>	
<b>Agent Name</b>	Mr Jonathan Buckwell
<b>Company / Organisation</b>	DHA Planning
<b>Position</b>	Director
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We have answered 'no' only because it isn't clear from the Issues &amp; Options Report what approach is actually being proposed.</p> <p>We would object to the unnecessary use of phasing requirements being placed on Green Belt sites since, as is recognised at paragraph 6.4.4, the Council's own evidence shows that many Green Belt sites can be delivered early and some can help to secure key infrastructure. Unnecessary constraints on supply are likely to lead to a failure to provide a consistent five-year supply of housing. Sites which can provide housing and an early stage should not be constrained by phasing restrictions unless it is very clear that the site would not be available for development until later in the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3366
<b>Full Name</b>	Mrs Margaret Stanier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Land should not be released until the necessary infrastructure is in place.</p> <p>Releasing any Green Belt land is not acceptable, but releasing it before all possible brownfield land has been used is even less acceptable. Building on brownfield sites needs to be made more profitable for developers than building on green fields.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3384
<b>Full Name</b>	Mrs Victoria Bate
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No



<b>Your response - Please add your response here</b>	'HOW' we live, is the question that needs asking. We can never possibly hope to build enough houses for all the need with current thinking and planning. Co- housing is a model that could be investigated. shared resources, smaller communities.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3427
<b>Full Name</b>	Mrs Ann Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The plan places reliance on releasing large parcels of green belt land. Once the protection is taken away developers will push to build on the land as it is cheaper and cheaper and has quicker returns for them. Green Belt should be taken out of the plan.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3481
<b>Full Name</b>	Mrs Louise Saul
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I disagree that villages should be able to come forward at any time as there wouldn't be significant pressure on infrastructure. Our villages already have congested roads and overcrowded public transport.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3578
<b>Full Name</b>	Mrs Sandra Jackson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	<p>You state "Most small to medium urban sites can be developed without placing significant pressure on local infrastructure" - this is just wrong. There is no more capacity.</p> <p>The implication within your wording for this question is that Green Belt land will be released for development - this is just wrong. You have not demonstrated exceptional circumstances. In fact, there are no circumstances, exceptional or otherwise, that would make it right to build on our precious Green Belt. Leave it alone for future generations to enjoy.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3701
<b>Full Name</b>	Mr Andrew Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	A priority order needs to start with Greenbelt, be assessed against type and economic development issues. Greenbelt building needs to be restricted wherever possible.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3742
<b>Full Name</b>	Mr Peter Howard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Green belt land should always be developed last. Small and medium developments can have radical cumulative effect, so should also be phased. Regarding 6.4.4 developers will always want to develop Green Belt land, which is why DBC should make sure that all Brownfield sites are exploited first. This paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3787
<b>Full Name</b>	Mr Anthony Warren
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Using the development at Hicks Road in Markyate as an example, the infrastructure needs to be developed before the houses are built instead of after the event
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3827
<b>Full Name</b>	Mr Michael Arrowsmith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The sequence of development should be brownfield first, followed by small to medium development in urban areas taking into account the additional infrastructure that will be required. Green belt and farm land should be protected and not used for housing development.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3828
<b>Full Name</b>	Mr Michael Arrowsmith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The sequence of development should be brownfield first, followed by small to medium development in urban areas taking into account the additional infrastructure that will be required. Green belt and farm land should be protected and not used for housing development.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO3898
<b>Full Name</b>	Dr Rachael Frost
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Green belt should be the absolute last option. There should be a limit on the number of small to medium size developments before further infrastructure is required (and a definite contribution from each small developer to infrastructure investment), as these do have cumulative effects. Infrastructure should be put in place before the housing itself to ensure it will actually happen.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP103939
<b>Full Name</b>	Mr Tim Varley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Greater weight must be given to infrastructure considerations before any decision is taken to release Green Belt. It is very easy to say that infrastructure improvements can follow but such infrastructure can have an even greater impact upon the environment over and above that caused by the original development.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP104135
<b>Full Name</b>	Mr Graham Hoad
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I wish to register an objection to the loose notion of brownfield sites. Since I came to live in Tring a large number of employment centres or facilities have been or at risk of being lost to housing. Some of these might include: Rose and Crown Hotel, Weavers house, Squash courts Parsonage Place, George Hotel, Irvine Printers, William Cox, E H Smith, Rodwells, Akeman Street Business Park, NHS Clinic, Prentices, Bones, Tring TV, Wright and Wright garage, Medical Supplies Western Road, Convent Schools, Western Road Offices, Hastoe Riding Stables, Grove Garage, Off licence Kings Street, Gower's Yard, Harrowell's office, Spider's Shop, Gannell

	<p>Farm Diary, Barnet's Bakery and Market garage/ Tyre and Exhaust centre. The list is not exhaustive. In many cases the business or facility was not seemingly redundant or in total disuse but it is suspected that housing became a more profitable use.</p> <p>I do not object to housing but its provision should not be at the expense of employment or services.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO4319
<b>Full Name</b>	Mr Bruce Morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Too easy to default to the release of Green Belt to cover for delays with Brownfield options. The Government appears to be pushing councils to concentrate on Brownfield options and DBC should comply.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO4326
<b>Full Name</b>	Dr Lucy Murfett
<b>Company / Organisation</b>	Chilterns Conservation Board
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Chilterns Conservation Board would support a phasing approach that encourages the delivery of brownfield sites first.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO4341
<b>Full Name</b>	Mr David Hannah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<b>Your response - Please add your response here</b>	With reference to Be-H3, I strongly disagree with the proposed phasing of delivery for this site. Despite repeated suggestions from all sides that Brownfield and Urban sites should be prioritised over Greenbelt sites, the Schedule of Site Appraisals (for Large Greenfield sites) October 2017 shows Be-H3 as delivering 50 houses per year from 2020/21 onwards – essentially the start of the Plan cycle. How does this match up with the government desire to prioritise Brownbelt / urban development?
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO4383
<b>Full Name</b>	Mr Adrian Bate
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	All the wording seems to indicate an inevitable erosion of Green Belt. Green Belt should be sacrosanct, so let's expunge it from any consideration.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO4452
<b>Full Name</b>	Mr Robert Bailey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	It is completely wrong to say that small urban sites can be developed without placing significant pressure on local infrastructure . Lots of small numbers still add up to a large number and infrastructure in Berkhamsted is already overstretched so ANY addition will put pressure on.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO4709
<b>Full Name</b>	Mr Keith Bradbury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Brownfield sites should be built on before Green Bel sites are considered for development.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP104866
<b>Full Name</b>	
<b>Company / Organisation</b>	Watson Howick
<b>Position</b>	
<b>Agent Name</b>	Mrs Julia Riddle
<b>Company / Organisation</b>	Castle Planning
<b>Position</b>	Director
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>It is recognised that the preferred approach to the timing of site delivery will require the steady release of land through the Plan period and encourage the development of brownfield sites.</p> <p>The Plan identifies that the delivery of small to medium sites, particularly within towns will have the benefit of being less reliant on new infrastructure and therefore can be brought forward at any time during the Plan period. There are also sites on the edge of towns, which have the benefit of direct linkages to existing infrastructure, which can also be brought forward easily and with minimal additional infrastructure requirements, and which could assist in meeting housing need early in the Plan period, for example tr-h4 at Tring.</p> <p>Whilst recognising that the historic strategy is to more significantly control the release of Green Belt sites, prioritising brownfield sites, it is right that the consideration of Green Belt sites should be undertaken in the context of the availability of infrastructure, relative need for development in this location and the benefits it would bring to that settlement.</p> <p>Specifically in Tring, there are sites on the edge of the settlement, such as that at Cow Lane/Station Road, which are on direct infrastructure routes, which would provide sustainable development, linked to existing infrastructure and close to the railway station. They are capable of early development in the Plan period, on the basis that they require minimal additional infrastructure and are capable of bringing about local benefits in terms of housing delivery to meet local need, as well as wider benefits in terms of walking and cycling linkages towards the train station and potentially landscape and ecological corridors.</p> <p>In relation to the site at Cow Lane/ Station Road, its early delivery would have benefits in terms of creating pedestrian and cycling linkages through the site to facilitate in the delivery of other adjacent sites, such as tr-h5, by improving its sustainable links to the local</p>

	transport network. The benefits and early delivery of sites such as tr-h4, and the benefits that it would bring in terms of facilitating the delivery of other sites in the Plan period, should therefore be carefully considered as part of the proposed approach to the timing of delivery of sites.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO4904
<b>Full Name</b>	Mr Simon Scott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I object strongly on any development on greenbelt land
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO4983
<b>Full Name</b>	Ms Anette Corbach
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5030
<b>Full Name</b>	Mr Chris Lumb
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I am categorically against the re-classification of Green Belt land as housing land. DBC should pay due heed to the submission/s from the Council for the Protection of Rural England (CPRE) in this regard. It goes without saying that developers will rush to build on such sites, as houses built on such land will command higher prices, and there will be less complication involved in developing



	<p>a site that is on 'virgin' territory, as opposed to a green-field or brown-field site.</p> <p>Paragraph 6.4.2 fails to take into account the aggregate effect of sites that are of small and medium size, since when taken together, the overall effect of such sites will be both significant and valuable in terms of reaching targets.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5250
<b>Full Name</b>	Mrs Catherine Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5272
<b>Full Name</b>	Mr Gary Ansell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I do not agree with the phased release of Green Belt land for development. All brownfield sites must be developed before any development of Green belt land is considered.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5321
<b>Full Name</b>	Miss Giulietta Cinque
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The provision of housing on Green Belt land by developers for commercial gain cannot possibly be described as "exceptional circumstances"

	<p>This directly contradicts Central Government guidance and instead adopts the property developers' line that it is easier to develop greenfield sites first. Brownfield sites should be developed first, regardless of the additional the difficulties and costs.</p> <p>it will always be easier and more attractive to developers to build on Green Belt / greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' should NOT be abandoned for expediency and cost efficiency to the benefit of the greedy developer. Building further developments adjacent to recently re-developed areas is harmful to the environment and exhausting of the services and infrastructure.</p> <p>"... Our evidence is telling us that housing need is likely to substantially increase ..." Predictions of future housing need are difficult, due to immigration / emigration, which are influenced by numerous factors. The impact on Brexit on the UK's population could be significant. It would be prudent to defer assessments of future housing needs until the result of the UK's departure from the EU is clear. Encourage people to have SMALLER FAMILIES!</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP105385
<b>Full Name</b>	Mr John Ingleby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Before the existence of this consultation became general knowledge, Rectory Farm in Kings Langley (site KL-h2) was for sale with an expected price of £3-3.5 million. This was based on the reasonable assumption that planning permission would be granted for building on approximately 1-acre of existing, dilapidated farm buildings. Once the Council's proposals for building on the surrounding Article 4 Green Belt became known, the selling price rose above £8.5 million.</p> <p>Consequently the prospective purchaser must now justify their investment by building very many more houses on the surrounding Green Belt land, which will then cease to be available to meet the needs of local people. Hence decisions on timing are no longer governed by planning policies and the local community's needs, but rather by those with the deepest pockets.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP105397
<b>Full Name</b>	Mr Reuben Bellamy

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>It will be particularly important that the local plan sets out how the need for specialist older person accommodation that will have to be met, given the well understood demographic trend identified in paragraph 6.3.24.</p> <p>At paragraph 159 of the NPPF there is a requirement to identify the scale of housing needed for all types of housing, including older people. In addition, the Planning Practice Guidance advises; “This could include sites for older people’s housing including accessible mainstream housing such as bungalows and step-free apartments, sheltered or extra care housing, retirement housing and residential care homes. Where local planning authorities do not consider it appropriate to allocate such sites, they should ensure that there are sufficiently robust criteria in place to set out when such homes will be permitted. This might be supplemented by setting appropriate targets for the number of these homes to be built. (Paragraph: 006 Reference ID: 12-006-20150320)”</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5440
<b>Full Name</b>	Mr Pdraig Dowd
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>As referenced in earlier responses, a reactive approach is not acceptable.</p> <p>DBC needs to first lay out its development objectives and associated plans to achieve it for the future, that recognises and integrates with its current state, that sets out the best sited areas to develop and an infrastructure plan including how to is to be executed. After that, there is a landscape/backdrop for actual development of accommodation that DBC pursues as opposed to the haphazard development as well as organising its staging. If properly done, this will achieve improved and manageable growth over time.</p> <p>Your flexible approach to Green Belt and what is it/what ca give is reflective of an attitude of the easiest way possible to address this issue.</p>
<b>Include files</b>	

<b>Number</b>	Question 19
<b>ID</b>	LPIO5492
<b>Full Name</b>	Mr Garrick Stevens
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Brownfield sites should be released first but there are critical contradictions within this section.</p> <p>It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt].,</p> <p>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have a small effect but when combined they become intolerably large for towns like Berkhamsted.</p> <p>Strongly disagree with para 6.4.4 – it will always be easier and more attractive to developers to build on greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency. This paragraph should be removed</p> <p>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5521
<b>Full Name</b>	Ms Geraldine Whiteside
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>No housing development should take place in what is currently designated green belt. None of the Kings Langley sites mentioned in the plan, including Shendish, are acceptable because they are in the green belt.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5544
<b>Full Name</b>	Mr Peter Brown

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Makes release of green belt land too attractive to developers. Continuous development of small to medium sites places significant pressure on infrastructure. This is certainly the case in Berkhamsted, where the cumulative pressure of un-phased, small to medium sites places on the infrastructure needs to be recognised
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5584
<b>Full Name</b>	Mr Michael Ridley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Clearly, timing should be concentrated on brown field sites, and other sites not in The Green Belt.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5606
<b>Full Name</b>	Mrs Christine Cosgrave
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	All of the sites suggested in my area all of which are large green belt areas in private ownership are suggested for release in the 0-5 timescale, there is no evidence of stagger here
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5651
<b>Full Name</b>	Mr Nigel Vanner
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Brownfield sites must be developed first and developers must be charged with ensuring that infrastructure is put in as a priority rather than as an after thought. Providing critical aspects of infrastructure should be a condition of gaining planning approval and sign off/adoption by the council at the end of the development
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5680
<b>Full Name</b>	Mr Alastair Greene
<b>Company / Organisation</b>	Little Gaddesden Parish Council
<b>Position</b>	Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5783
<b>Full Name</b>	Mr Quentin Ross-Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Tackle brown field sites first. Developing on the Green Belt sites will destroy the character of villages such as kings Langley and will all the towns and villages just become a coalescence.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5787
<b>Full Name</b>	Mr Adrian Ward
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5816
<b>Full Name</b>	Mr Roy Farrant
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Clause 6.4.2 says "Most small to medium urban sites can be developed without placing significant pressure on local infrastructure". This may be true for one or two homes, but the numbers being envisaged here as "small to medium" will have a very large impact on the local infrastructure. Taking Kings Langley as an example, the Issues and Options Consultation Sustainability Appraisal Working Note suggests that building homes and offices around the village will "encourage walking and cycling" as access to the village centre from the proposed areas is largely flat. This gives a most unrealistic impression. It may well be that some of the new residents or office workers choose to walk or cycle for some journeys, but no-one can claim it will be all of them for all journeys. The consequence therefore has to be increased vehicular traffic, when the local roads are already at a standstill for large parts of the day and existing residents are becoming more and more angry about the level of street parking. West Herts College caused huge pressure on local roads due to parking - this will surely be made even worse. The premise as stated in the plan is quite simply false and therefore misleading.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5866
<b>Full Name</b>	Mr Michael Lelieveld
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	We concur with the response provided by Berkhamsted Town Council to this question.
<b>Include files</b>	

<b>Number</b>	Question 19
<b>ID</b>	LPIO5892
<b>Full Name</b>	Mr Grahame Partridge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO5967
<b>Full Name</b>	Ms Fiona Coulling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	It is essential to allow the plan to be responsive to economic, political and social/demographic changes over the life of the plan.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6046
<b>Full Name</b>	Georgina Tregoning
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I am concerned about the infrastructure needs of developments. As Tring and Berkhamsted are already very crowded, with narrow roads, better road links, schools, surgeries need to be considered. I do not agree that most small to medium sites can be developed



	without placing significant pressure on local infrastructure. Consideration should be given to these aspects at the time of debating planning permission.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6311
<b>Full Name</b>	Miss Lucy Muzio
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6343
<b>Full Name</b>	Mr andrew miller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Developers will always drive when and how land is developed.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6418
<b>Full Name</b>	Mr Nicholas Ring
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Infrastructure to sustain any future development must be a prime consideration. Building homes before implementing sustainable infrastructure is akin to putting the cart before the horse.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6458

<b>Full Name</b>	Mrs anna silsby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	You state: "Most small to medium urban sites can be developed without placing significant pressure on local infrastructure." That simply is not true when reviewing the proposed sites in Bovingdon; or as a general statement. In order to approve any development the existing local infrastructure should be analysed. Referring to my previous comments; a lot of infrastructure is already under invested as it stands - and referring to Bovingdon specifically; the High Street congestion; or for example HH station clearly point to underinvestment in the current status. No further development should be allowed before the existing infrastructure issues have been solved.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6628
<b>Full Name</b>	Mr Andrew Lambourne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Calling for sites to be put forward by developers and landowners encourages a reactive approach rather than a proactive strategy-led approach. Developers will favour the easiest option for themselves, not the best option for Dacorum's wider stakeholders. It is up to DBC to seek by all means possible to protect the rural environment and rural assets by being as robust and proactive as possible over the identification of potentially suitable brown field sites or locations which minimise impact on established homeowners.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6781
<b>Full Name</b>	Helen Cole
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The idea that small developments can pop up at any time without infrastructure impact completely misses the point. The reason are roads are full and services are creaking is absolutely as a result of this approach, if you don't look at the big picture and consider it as a whole infrastructure is overlooked and quality of life deteriorates for all. One small development may have limited impact, but twenty small developments have a huge impact.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP106786
<b>Full Name</b>	Mr Geoff Latham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	As much land as possible should be made available as soon as possible. Restriction on supply of services is cited as the reason for restricting the amount of residential land made available, whereas a large increase in population would either make the provision of services more economic, eg shops and travel services, or lead to greater voter pressure for Councils to provide or press for improvements, eg a large increase in demand for hospital services and pressure on links to Watford could encourage proper hospital facilities in Hemel Hempstead.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP106902
<b>Full Name</b>	Bradford Gunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	No, as highlighted earlier (a) all available Brownfield sites must be identified at this initial planning phase and included in the approved, prioritised plan. It is too easy to focus only on Green Belt land in order to avoid thorny issues like compulsory purchase which will result in the exploitation of the Green Belt and is contrary to the stated top priority of minimising the loss of Green Belt; (b) the required infrastructure in the relevant community

	to support new homes needs to be identified and addressed as part of the delivery plan; (c) if the necessary infrastructure to support new homes cannot be put in place for whatever reason the site is not to be built.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6986
<b>Full Name</b>	Mrs Jenna Selby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Greenbelt shouldn't be built on.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6991
<b>Full Name</b>	mr michael hicks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Housing land release should be phased as part of the green belt release at the same time that employment land is released
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO6993
<b>Full Name</b>	Mrs Jenna Selby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO7109

<b>Full Name</b>	Mr & Mrs Fox
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our names.</p> <p><b>BRAG RESPONSE TO Q19 (FULL DOC ATTACHED TO Q46)</b></p> <p><b>Question 19</b></p> <p><i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><i>No</i></p> <p>Agree brownfield sites must be released first but there are critical contradictions within this section.</p> <p>It needs to confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt]</p> <p>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</p> <p>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure</p> <p>which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should</p> <p>be recognised.</p> <p>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt /</p> <p>Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first</p> <p>and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and</p> <p>should not be abandoned for expediency and as such this paragraph should be removed</p>
<b>Include files</b>	

<b>Number</b>	Question 19
<b>ID</b>	LP107320
<b>Full Name</b>	Brian and Heidi Norris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We fully understand the need for additional housing in this country, but it should not be to the detriment of towns such as ours. We do not intend to reply to the 46 questions one by one, but support the answers given by the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group and support Option 1B in the Strategy Plan. Even this number of 600 further homes is, in our view, more than enough, but we understand that is an existing commitment.</p> <p>BRAG response to Question 19 (please note full document is attached to Q46)</p> <p>Question 19</p> <p><i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>Agree brownfield sites must be released first but there are critical contradictions within this section.</p> <p><input type="checkbox"/></p> <p>It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</p> <p><input type="checkbox"/></p> <p>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</p> <p><input type="checkbox"/></p> <p>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure</p> <p>which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should</p> <p>be recognised.</p> <p><input type="checkbox"/></p> <p>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt /</p> <p>Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first</p>

	and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO7468
<b>Full Name</b>	MR Christopher Kendall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Answer – NO To propose and maintain multiple large Green Belt sites as potential options for future development around our towns and villages is a very bad policy – particularly when such options are perpetual open-ended development sites over the next twenty years and beyond. It creates concern and uncertainty for large numbers of residents whose property is near or affected by the earmarked sites and adversely affects plans they may have for moving home. Also affected are those whose livelihoods may be threatened.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO7861
<b>Full Name</b>	Dr Peter Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO7945
<b>Full Name</b>	Mr Norman Groves
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I would like to confirm that I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG RESPONSE TO Q19</p> <p>Agree brownfield sites must be released first but there are critical contradictions within this section.</p> <p><input type="checkbox"/></p> <p>It needs to confirmed that 6.4.2 relates to the 'rban'sites [not Green Belt]</p> <p><input type="checkbox"/></p> <p>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</p> <p><input type="checkbox"/></p> <p>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure</p> <p>which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should</p> <p>be recognised.</p> <p><input type="checkbox"/></p> <p>Strongly disagree with 6.4.4 –it will always be easier and more attractive to developers to build on Green Belt /</p> <p>Greenfield sites rather than brownfield –that is why the Government has stressed the need to develop brownfield first</p> <p>and DBC should comply with this guidance. The 'ood reasons'identified in the recent Core Strategy still apply and</p> <p>should not be abandoned for expediency and as such this paragraph should be removed</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO7994
<b>Full Name</b>	Mr Michael Nidd
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No



<b>Your response - Please add your response here</b>	<b>at para 6.4.4</b> – it will always be easier and more attractive to developers to build on Green Belt /greenfield sites rather than brownfield, which is why the Government has stressed the need to develop brownfield first and DBC policy, which is entirely in line with that of urban renewal, must be compliant with this guidance.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO8441
<b>Full Name</b>	Mr Peter Shell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Because of the above I am not in a position to myself provide detailed answers to all the questions, but have seen the response prepared by BRAG and agree with their comments which should also be regarded as my own.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19

<b>ID</b>	LPIO8541
<b>Full Name</b>	Mrs Sarah Rees
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO8568
<b>Full Name</b>	Helen & Stuart Brown
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action group have responded in full to the issues and options consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation the we wish DBC to duplicate BRAG's responses under our name.</b></p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
Include files	
Number	Question 19
ID	LP108617
Full Name	Spencer Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

<p>Your response - Please add your response here</p>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 19</p>
<p><b>ID</b></p>	<p>LP108665</p>
<p><b>Full Name</b></p>	<p>MRS G RUSSELL</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>No</p>
<p>Your response - Please add your response here</p>	<p>No</p> <p>1- ref para 6.4.4: There should be no release of Green Belt, staggered or otherwise.</p> <p>2- Need for proposed levels of development is not proven.</p> <p>3- Planning permission should include conditions on timing of the start and completion of work, recognising</p>

	that environmental constraints may cause some delay, but start should be within a year, or the developer fined, eg a percentage of the value of the planned development.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO8731
<b>Full Name</b>	Mrs Pat Berkley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG's responses under my/our name.</b></p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19

<b>ID</b>	LPIO8830
<b>Full Name</b>	Mr Lawrence Sutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO8998
<b>Full Name</b>	David Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No And I strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt.
Include files	
Number	Question 19
ID	LPIO9019
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	And I strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt.
Include files	
Number	Question 19
ID	LPIO9764
Full Name	Aly MacLean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> </ul>

	<ul style="list-style-type: none"> <li>4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP109812
<b>Full Name</b>	Mr Paul Wardle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our names.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this section.</li> </ul>



	<ul style="list-style-type: none"> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed.</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP109987
<b>Full Name</b>	mr Kevin Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p>

	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10035
<b>Full Name</b>	Jill Mewha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p>

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<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10104
<b>Full Name</b>	Melanie Frankel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10152
<b>Full Name</b>	Natalie Crane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10209
<b>Full Name</b>	Mr Tim Beeby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p>

	<p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10256
<b>Full Name</b>	John and Jane Beeley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p>

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

.....

**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
- Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10306
<b>Full Name</b>	Kathleen Lally
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I am writing in response to the latest plan for housing development in Berkhamsted, most of which suggests an excessive and impractical number of new houses. I

have read your Local Plan 2017 and I have read the reply of Berkhamsted Residents' Action Group (BRAG) and agree that Option 1B is the only option acceptable.  
I agree entirely with the BRAG response to your plan.  
**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
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<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10354
<b>Full Name</b>	J&P Savage
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Secondly, the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept



this email as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
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<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10420
<b>Full Name</b>	Mr Daniel Parry
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as

	<p>confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10469
<b>Full Name</b>	David Burbidge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, <b><u>I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</u></b>

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
  - Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10519
<b>Full Name</b>	Mr Stephen Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

	<p>I would however like to make a few specific comments.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10567
<b>Full Name</b>	Mr Roger Petts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>...</p>

	<p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10614
<b>Full Name</b>	Simon Chilton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

	<p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10664
<b>Full Name</b>	Sally and David Williams
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please register as support for BRAG's submission.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> </ul>

	<ul style="list-style-type: none"> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10712
<b>Full Name</b>	Mrs Jenny Jenkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p><b>BRAG response to Question (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> </ul>

	<ul style="list-style-type: none"> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10757
<b>Full Name</b>	Taylor Wimpy Strategic Land
<b>Company / Organisation</b>	Taylor Wimpy Strategic Land
<b>Position</b>	C/O Pegasus Group
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The approach to timing of site release is not clear. It appears that brownfield sites will be prioritised for delivery ahead of greenfield sites. However, it is noted at paragraph 6.4.4 that there is a good supply of Green Belt sites which can come forward promptly. We consider that the Council should be informed primarily from information from site promoters who have a good understanding of site specific constraints and likely timescales for delivery. It is noted that development on previously-development land can be susceptible to viability issues by their nature and as such, should not be relied upon for development ahead of greenfield sites for which homes and infrastructure which are more readily deliverable. Furthermore, the release of greenfield sites could in turn support the delivery of infrastructure necessary to allow brownfield sites to come forward.</p>



	<p>In light of a potential significant increase in housing requirements, it would be prudent of the Council to ensure that as much housing can come forward as soon as practicable to ensure that housing needs are met sooner rather than later and that delivery can keep pace with requirements. Failure to do so could risk in the emergence of a housing shortfall. By contrast, early over-provision could be used to offset lower rates of supply at later stages of the Plan period.</p> <p>It is noted that the Council proposed a staggered approach to the delivery of allocations in the Site Allocations DPD, including on smaller sites such as LA6. Following discussions during that Examination, the Council agreed modifications to remove the phasing of delivery from three sites, since certain site-specific factors would regulate the release of land in any case. Notwithstanding that fact, it was acknowledged that by deleting the proposed phasing of the sites, it may be possible for some sites to come forward early and for applications to be made in advance, to ensure delivery keeps pace with the planned trajectory.</p> <p>For full response please see question 46.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10777
<b>Full Name</b>	Mrs J Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10805
<b>Full Name</b>	Grant Imlah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Moreover i am aware that The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we

request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name. However, we would like to take this opportunity emphasize just a few of the most important points within that response.

**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
  - Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10858
<b>Full Name</b>	Sheila Dawkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I have studied the above plan, accessed the BRAG website, and attended the Berkhamsted Citizens Association Visioning Evening on 15 November and the

Berkhamsted Town Council presentation on 22 November.

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
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<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO10906
<b>Full Name</b>	Jean Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 19
ID	LPIO10955
Full Name	Christopher Stafford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core</li> </ul> </li> </ul>

	Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11006
<b>Full Name</b>	Mrs Patti Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be</li> </ul> </li> </ul>

	abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11052
<b>Full Name</b>	J M Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11133
<b>Full Name</b>	Cally Emmas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11180
<b>Full Name</b>	Mr Neil Aitchison
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	More land should be released in Hemel Hempstead before other settlements to make up its present delivery deficit.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11227
<b>Full Name</b>	Jon Rollit
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They</li> </ul> </li> </ul> </li> </ul>

	<p>certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</p> <ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11277
<b>Full Name</b>	Kate Locke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>In addition I would reiterate the extensive points made in the BRAG response to the ‘Issues &amp; Options’ consultation. I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. The Berkhamsted Residents Action Group (BRAG) has responded in full.</p> <p>In addition, I like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt] <ul style="list-style-type: none"> <li>4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The</li> </ul> </li> </ul> </li> </ul>



	<p>cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</p> <ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11329
<b>Full Name</b>	David Greenwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Brownfield sites need to be released first. Any site should be built comprehensively, not incrementally, if this is going to prolong disruption for existing residents and businesses.</p> <p>Safeguarding sites for future development means land banking which is disapproved of by government.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11365
<b>Full Name</b>	Ms Lorraine Gilmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>BRAG has responded in full to the ‘Issues &amp; Options’ consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish Dacorum Borough Council (DBC) to duplicate BRAG’s responses under my name. However, I</p>

would like to take this opportunity emphasise some of the most important points within that response.

**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
  - Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11414
<b>Full Name</b>	Conian
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept</p>

this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.

....

**BRAG response to Question 19 (please note full document is attached to Q46)**

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

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
  - Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11452
<b>Full Name</b>	Mr & Mrs J Neale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Site KL-h1 is detailed as being capable of delivering 75 houses pa between 2019 and 2023. The loss of this Green Belt land is very early in the planning timescale.

	If by 2036 growth figures were wrong, this Green Belt land will have gone forever.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11524
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>It is wrong to claim (in 6.4.2) that "most small to medium urban sites can be developed without placing significant pressure on local infrastructure." In Berkhamsted we are now living with the consequences of this flawed assumption, as 600 homes have been built since 2006 with little accompanying improvement in infrastructure, and quality of life in the town has become significantly worse. There are problems with traffic congestion on all the main through roads in Berkhamsted, and the shortage of car parking means cars are parked along both residential and through roads clogging them up and impeding drivers. It is difficult to obtain a GP appointment, the secondary school Ashlyns is at capacity, the roads near the rail station routinely flood and there are problems with waste water drainage. The point is, the cumulative impact of successive small to medium sites being developed is as significant as if a single large site had been developed, in terms of infrastructure requirements.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11603
<b>Full Name</b>	Janet and James Honour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p>

	<p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11649
<b>Full Name</b>	john and barbara neale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Site KL-h1 is detailed as being capable of delivering 75 houses pa between 2019 and 2023. The loss of this Green Belt land is very early in the planning timescale. If by 2036 growth figures were wrong, this Green Belt land will have gone forever.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11758
<b>Full Name</b>	Edmund Hobley

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</b></p> <p>...</p> <p><b>Brag Response to question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
Include files	
Number	Question 19
ID	LPIO11908
Full Name	Janet Mason

<b>Company / Organisation</b>	Berkhamsted Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We agree that brownfield sites should be released first but there are critical contradictions within this section.</p> <p>It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt].</p> <ul style="list-style-type: none"> <li>ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have a small effect but when combined they become intolerably large for towns like</li> </ul> <p>We strongly disagree with para 6.4.4 – it will always be easier and more attractive to developers to build on greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency. This paragraph should be removed.</p> <p>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1011955
<b>Full Name</b>	Dee Sells
<b>Company / Organisation</b>	Markyate Parish Council
<b>Position</b>	Parish Clerk/ RFO
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Yes</b></p> <p><i>Markyate Parish Council is concerned that the green field sites being considered as those proposed by the landowners or developers who are able to employ consultants to promote their plans while local people, including Parish Councillors do not have the same resources. As an example, the Hicks Road houses were promoted and ultimately marketed as having bus</i></p>

	<i>transport to work. The service is so poor that this is really untrue</i>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO11992
<b>Full Name</b>	Mark Behrendt
<b>Company / Organisation</b>	Home Builders Federation
<b>Position</b>	Planning Manager – Local Plans
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>When considering the deliverability of the plan the Council must look to ensure that it can deliver a consistent supply of sites and homes across the plan period. This will mean ensuring that there are sufficient sites that can deliver homes earlier in the plan period and address any backlog in delivery within the first five years, as required by PPG. Whilst large strategic sites are an important part of housing supply but the Council should not seek to rely on unrealistic delivery expectations that sees such sites coming forward early in the plan period. A balanced and realistic approach ensures consistent delivery not only in this plan period but, potentially, into the next.</p> <p>Whilst we would support the Council's intentions to safeguard land for development it is important to remember that there could be neighbouring Boroughs not within the HMA that are unable to meet their needs. The Council should examine with neighbouring LPAs whether they can meet their own housing needs prior to making any decision on safeguarding land for future development. Where neighbouring LPAs cannot meet needs then any land that is considered suitable for development should be brought forward in this plan and not safeguarded for the future.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12055
<b>Full Name</b>	David Wilyman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in



the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

Standard BRAG response to Question 19. Please note full document is attached to Question 46

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this
- It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be
  - Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12105
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area,

	<p>which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>We consider that it is essential that controls continue on the release of Green Belt land for development. Given the large areas of Green Belt and AONB potentially under threat, pressure must be put on developers to prioritise brownfield land, and particularly in the towns and larger villages.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1012147
<b>Full Name</b>	Ray Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Standard BRAG response to Question 19. Please note full document is attached to Q46.</p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the</li> </ul> </li> </ul> </li> </ul>

	<p>infrastructure of our towns and villages should be</p> <ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1012211
<b>Full Name</b>	Douglas & Christina Billington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt] <ul style="list-style-type: none"> <li>4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12290
<b>Full Name</b>	Richard Frankel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Standard BRAG response to Question 19. Please note full document is attached to Question 46.</p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>It needs to confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt] <ul style="list-style-type: none"> <li>4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which</li> </ul> </li> </ul> </li> </ul>

	<p>development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</p> <ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1012352
<b>Full Name</b>	Mr Brian Kazer
<b>Company / Organisation</b>	Tring in Transition
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>No</b></p> <p>Para 6.4.4 re Green Belt sites needs an indication of what “larger ones” means in terms of number of houses: “...the larger ones have the ability to secure necessary key infrastructure. This will need to be tested carefully when we assess the suitability of these sites as the plan is prepared.”</p> <p>We suggest the final sentence of the above extract is a major issue for the next edition of the Plan.</p> <p>Phased development of a site should be accompanied by provision of play space for children at very early stage in the development.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1012363
<b>Full Name</b>	ms rona morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Too easy to default to the release of Green Belt to cover for delays with Brownfield options. The Government appears to be pushing councils to concentrate on Brownfield options and DBC should comply.
Include files	
Number	Question 19
ID	LPIO12434
Full Name	Judy Halden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Standard BRAG response to Question 19. Please note full document is attached to Question 46.</p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should</li> </ul> </li> </ul>

	comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12482
<b>Full Name</b>	Meenakshi Jefferys
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to</li> </ul> </li> </ul>

	develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12529
<b>Full Name</b>	Mrs Jane Barrett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Standard BRAG response for Question 19. Please note full document is attached to Question 46.</p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the</li> </ul> </li> </ul>



	Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12578
<b>Full Name</b>	mr paul healy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the</li> </ul> </li> </ul>

	Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12628
<b>Full Name</b>	Merrick Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasise just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites</li> </ul> </li> </ul>

	rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12677
<b>Full Name</b>	Monika & Casper Gibilaro
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under our name</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to</li> </ul> </li> </ul>

	develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12725
<b>Full Name</b>	Lorna Ginn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites</li> </ul> </li> </ul>

	rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12774
<b>Full Name</b>	Mr Raymond Phipps
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core</li> </ul> </li> </ul>

	Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12821
<b>Full Name</b>	Ingrid Carola McKenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should</li> </ul> </li> </ul>

	comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12869
<b>Full Name</b>	Mr Stephen Lally
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12923
<b>Full Name</b>	Jon Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be</li> </ul> </li> </ul>



	abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO12972
<b>Full Name</b>	Edward Keane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core</li> </ul> </li> </ul>

	Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13021
<b>Full Name</b>	Bettina Deuse
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>...</p> <p><b>BRAG response to question 18 below (full BRAG response see question 46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core</li> </ul> </li> </ul>

	Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13074
<b>Full Name</b>	Mr Paul Tinworth
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed.</li> </ul> </li> </ul>

Include files	
Number	Question 19
ID	LPIO13122
Full Name	Hilary Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13188
<b>Full Name</b>	Mr J G Botha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	Road infrastructure should be put in place first if anything is to be built and any property development should be staggered in a way that developer can only build more once the ones already built have been sold and occupied. This will prove if there really is a shortage of houses in the area.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13384
<b>Full Name</b>	Mrs Christine Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	As how would you manage traffic, parking, doctors and schools.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13385
<b>Full Name</b>	Mr Alan Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	As how would you manage traffic, parking, doctors and schools.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13456

<b>Full Name</b>	Mrs Catherine Imber
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core</li> </ul>

	Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13504
<b>Full Name</b>	Deborah Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be</li> </ul> </li> </ul>

	abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13559
<b>Full Name</b>	Mr Alan O'Neill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good</li> </ul> </li> </ul>



	reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13612
<b>Full Name</b>	Sue O'Neill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good</li> </ul> </li> </ul>

	reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13674
<b>Full Name</b>	Tim Uden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should</li> </ul> </li> </ul>

	comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13739
<b>Full Name</b>	Edward Hatley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to</li> </ul> </li> </ul>

	develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13789
<b>Full Name</b>	Mr Roger Didham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should</li> </ul> </li> </ul>

	comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13844
<b>Full Name</b>	Alex Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites</li> </ul> </li> </ul>

	rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO13923
<b>Full Name</b>	David and Katie Hannah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Question 19</b> <u>Do you agree with the proposed approach to the timing of site delivery?</u></p> <p><b>No.</b> With reference to Be-H3, I strongly disagree with the proposed phasing of delivery for this site. Despite repeated suggestions from all sides that Brownfield and Urban sites should be prioritised over Greenbelt sites, the Schedule of Site Appraisals (for Large Greenfield sites) October 2017 shows Be-H3 as delivering 50 houses per year from 2020/21 onwards – essentially the start of the Plan cycle. How does this match up with the government desire to prioritise Brownbelt / urban development?</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14014
<b>Full Name</b>	Danny Jennings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum’s Local Plan.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14063
<b>Full Name</b>	Mr John Goffey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response to the DBC <i>Issues and Options</i> document. We would, in addition, like to add the following points concerning Question 33 of the above document.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14111
<b>Full Name</b>	Sue Elleray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>..</p>



	<p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14162
<b>Full Name</b>	Mr Richard White
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14304
<b>Full Name</b>	Ms Vicky Tattle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14391
<b>Full Name</b>	Ray Tattle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14440
<b>Full Name</b>	Giselle Okin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p>

	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14489
<b>Full Name</b>	Mr David Griffin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</i></p> <p><i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i></p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14766
<b>Full Name</b>	Ms Paula Farnham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues &amp; Options' consultation. I could make similar comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>However, I would like to take this opportunity to emphasize just a few of the most important points within that response.</p> <p>...</p>

**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

- Agree brownfield sites must be released first but there are critical contradictions within this section.
- It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
  - 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
    - Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.
  - Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14809
<b>Full Name</b>	Steve Baker
<b>Company / Organisation</b>	CPRE - The Hertfordshire Society
<b>Position</b>	Planning Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes (qualified) The Council should continue to exert control over timing of site delivery to give priority to brownfield sites. The release of Green Belt sites may well have a greater demand for new infrastructure and services than brownfield sites and should be avoided other than in exceptional circumstances.

	We agree with other objectors that paragraph 6.4.4 of the Issues and Options document states the fact that Green Belt sites can be delivered early. Developers would always prefer to develop green field sites first and it is not the suitability of these sites that needs to be tested, it is the exceptional circumstances that would justify a green belt release that must be proven.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14837
<b>Full Name</b>	Bev Mckenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</b></p> <p><b>In addition, I draw attention to some of the most important points within that response</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul> </li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14884
<b>Full Name</b>	Mr Michael Curry
<b>Company / Organisation</b>	Tring Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The important factor is securing and delivering the necessary infrastructure in a timely fashion as development takes place. In Tring the provision of employment land should precede the new dwellings.</p> <p>Local input should be sought before determining the phasing.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14940
<b>Full Name</b>	Malcolm and Jill Allen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO14989
<b>Full Name</b>	Mr Clive Freestone
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

	<p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15039
<b>Full Name</b>	Mr & Mrs D A Simmons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. We request you accept this summary as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>We would like to take this opportunity to emphasize a few of the most important points within that response, <b><i>in particular our response to Q25.</i></b></p>

	<p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt] <ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted <ul style="list-style-type: none"> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> </ul> </li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul> </li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15095
<b>Full Name</b>	Grand Union Investments
<b>Company / Organisation</b>	Grand Union Investments C/O Savills
<b>Position</b>	Associate Director
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• In finding the Core Strategy of 2013 sound on the basis of this being subject to an early review, the Inspector observed at paragraph 29 that the housing shortfall over the plan period is about 15% and, <i>'more importantly, there would be a general over-supply of housing in the short to medium term, especially over the next three years (as identified in the up-dated Trajectory)'</i>. In terms of the 'next three years', that updated trajectory anticipated the delivery of 535, 668 and 537 homes in the</li> </ul>

	<p>respective monitoring periods of 2013/14, 2014/15 and 2015/16. The Council's Annual Monitoring Report for 2015/16 (published January 2017) shows that actual completions have totalled 219, 379 and 659 homes in these same respective annual monitoring period. This represents a shortfall of 483 homes or 28% against that which was anticipated at the time the Core Strategy was found sound on the basis of an early review of the Core Strategy being undertaken. The Council is therefore already considerably behind the level of completions that was anticipated by the Core Strategy, which even without this shortfall, was based upon an overall shortfall of 15% or 1,698 dwellings over the plan period. For this further reason, it is essential that the new Local Plan is put in place as soon as possible, and with sufficient growth proposed to address the overall shortfall which was not met by the Core Strategy and the further shortfall which has already occurred since the adoption of the Core Strategy.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15104
<b>Full Name</b>	Grand Union Investments
<b>Company / Organisation</b>	Grand Union Investments C/O Savills
<b>Position</b>	Associate Director
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Paragraphs 6.4.3 explains that historically, the Council has sought greater control on the release of any Green Belt sites that are allocated for development as its wish was to give priority to the early delivery of brownfield sites. Paragraph 6.4.4, for example states that <i>'we believe there may be good reasons to continue the approach of staggering the release of any large Green Belt sites required'</i>. This general objective however needs to be set against the fact <i>'that housing need is likely to substantially increase'</i> over the plan period. In these circumstances maintaining policies that phase the release of Greenfield land to later in the plan period are no longer appropriate. This is particularly the case given the tendency for speedier delivery of housing on greenfield sites, relative to brownfield sites which can be more difficult to bring forward owing to the complexities of remediation and other legacy aspects of the prior use of the site.</li> <li>• The NPPF at paragraph 111 identifies one measure for ensuring the re-use of previously-developed land i.e. by 'setting a locally appropriate target for the use of brownfield land'. Any such target however should be</li> </ul>

	evidence-based, including a thorough analysis of the availability of previously-developed sites and the likelihood of the being delivered for housing in the plan period. The Council must therefore apply an approach whereby it aims to deliver all of the identified sites in the Local Plan as quickly as possible and not put in place an arbitrary obstruction to delivery, for example in the form of phasing.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15179
<b>Full Name</b>	Bert Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>To propose and maintain multiple large Green Belt sites as potential options for future development around our towns and villages is a very bad policy – particularly when such options are perpetual open-ended development sites over the next twenty years and beyond. It creates concern and uncertainty for large numbers of residents whose property is near or affected by the earmarked sites and adversely affects plans they may have for moving home. Also affected are those whose livelihoods may be threatened.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15199
<b>Full Name</b>	Valerie Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>To propose and maintain multiple large Green Belt sites as potential options for future development around our towns and villages is a very bad policy – particularly when such options are perpetual open-ended development sites over the next twenty years and beyond. It creates concern and uncertainty for large numbers of residents whose property is near or affected</p>

	by the earmarked sites and adversely affects plans they may have for moving home. Also affected are those whose livelihoods may be threatened.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15266
<b>Full Name</b>	Caroline Manson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19: <i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brown field sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build</li> </ul>

	on Green Belt / Greenfield sites rather than brown field – that is why the Government has stressed the need to develop brown field first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15318
<b>Full Name</b>	Mr Alan Conway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues &amp; Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>



<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15367
<b>Full Name</b>	Sue Wolstenholme
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p><b>Standard BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted.</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15429
<b>Full Name</b>	Nick Hanling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15477
<b>Full Name</b>	Sarah and Nigel Tester
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<p><b>Your response - Please add your response here</b></p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 19</p>
<p><b>ID</b></p>	<p>LPIO15533</p>
<p><b>Full Name</b></p>	<p>Miss Tanya Assarat</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>No</p>

<p><b>Your response - Please add your response here</b></p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> </ul> <p>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 19</p>
<p><b>ID</b></p>	<p>LPIO15582</p>
<p><b>Full Name</b></p>	<p>Melanie Llewellyn</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>No</p>
<p><b>Your response - Please add your response here</b></p>	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p>

	<p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15649
<b>Full Name</b>	Mr James Honour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> </ul>

	<ul style="list-style-type: none"> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15708
<b>Full Name</b>	Mark Pawlett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have</p>

	otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15756
<b>Full Name</b>	Maria & Colin Sturges
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15803
<b>Full Name</b>	David Kerrigan
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
Include files	
Number	Question 19
ID	LPIO15869
Full Name	D B Land and Planning
Company / Organisation	D B Land and Planning
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No



<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• DBLP is concerned about the proposed approach to the timing of housing delivery as it is not clear from paragraphs 6.4 to 6.4.5 as to whether the Council is proposing a phasing policy or not.</li> <li>• In terms of the delivery of housing sites, there is a requirement on the Council to demonstrate a continual 5-year housing land supply. Therefore, in allocating sites, the Plan has to be confident that sites can be delivered in the timeframes proposed by the applicants/promoter.</li> <li>• The delivery of greenfield green belt sites is inherently tied up with the success of the Plan in that it is difficult for sites to come forward in advance of a Reg 19 consultation. The recent SoS Perrybrook Call-In Decision in Tewkesbury Borough (PINS Ref: APP/G1630/V/14/2729497), highlights a case where a strategic green belt allocation can be relieved in advance of a Local Plan being adopted.</li> <li>• National guidance does not promote a sequential approach to delivery in terms of “brownfield first” DBLP would look to object to any such policy provisions which put a barrier in place to stop greenfield sites from coming forward until such time as specific brownfield sites had been delivered</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO15981
<b>Full Name</b>	Mr Robert Sellwood
<b>Company / Organisation</b>	The Crown Estate
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The significant increase in the proposed rate of housing means that it is no longer appropriate to seek to hold back greenfield and Green Belt sites to a later point in the plan period. These strategic sites can take a long time to start to produce completed homes and can also deliver important social and physical infrastructure. For these reasons, the plan should encourage the early release of both brownfield and greenfield / Green Belt sites to ensure the achievement of the new housing provision.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16061
<b>Full Name</b>	Dave Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16115
<b>Full Name</b>	Helen and Aaron Talbot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and</p>

	<p>secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16174
<b>Full Name</b>	Stuart Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16231

Full Name	Stuart Mears
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</b></p> <p><b>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
Include files	
Number	Question 19
ID	LPIO16292
Full Name	Kitty Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>please find the attached report written on mine and other residents request.</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be</p>

	<p>undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16354
<b>Full Name</b>	Aaron Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I support GFRA responses see below.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16401
<b>Full Name</b>	Ruth and Stephen Wright

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</b></p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
Include files	
Number	Question 19
ID	LPIO16467
Full Name	Andrew Yeomans
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
Include files	
Number	Question 19
ID	LPIO16543
Full Name	Ian Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>. Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>. It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> </ul>

	<p>. 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</p> <p>. Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</p> <p>. Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16826
<b>Full Name</b>	Jon G. Wright Dawn Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period</p>



	<p>by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16894
<b>Full Name</b>	Jan Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO16982
<b>Full Name</b>	Chris Pike
<b>Company / Organisation</b>	
<b>Position</b>	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
Include files	
Number	Question 19
ID	LPIO17039
Full Name	Jade Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver</p>

	<p>a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17096
<b>Full Name</b>	Grahame Senior
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17135
<b>Full Name</b>	D. Phillips
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I fully concur with the comments attached from BRAG. The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17229
<b>Full Name</b>	Debbie Crooks Pam Moss
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17286
<b>Full Name</b>	Margaret and Andrew Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<b>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully</b>

	<p>support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17343
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>...</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be</p>

	<p>demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17395
<b>Full Name</b>	Lesley Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 19 below (copy of full response attached to question 46)</p> <p><b><i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still</li> </ul>

	<p>apply and should not be abandoned for expediency and as such this paragraph should be removed</p> <ul style="list-style-type: none"> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17450
<b>Full Name</b>	Sara Bell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17509
<b>Full Name</b>	Emma Talbot
<b>Company / Organisation</b>	The Little Cloth Rabbit
<b>Position</b>	



Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>Please find attached a report (GFRA) about the proposed development of Tring.</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p> <p>...</p>
Include files	
Number	Question 19
ID	LPIO17557
Full Name	MR DAVID BROWN
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 19 below (copy of full response attached to question 46)</p> <p><b><i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> </ul>

	<ul style="list-style-type: none"> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17616
<b>Full Name</b>	Paul Hembury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning &amp; Development details my concerns comprehensively.</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have</p>

	otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17690
<b>Full Name</b>	Michael and Jill Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17739
<b>Full Name</b>	Diana Woodward
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express.</p> <p>BCA response to Question 19 below - full document attached to Question 46</p> <p><b><i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17795
<b>Full Name</b>	John and Helen Osborne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded</p>

	<p>should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17853
<b>Full Name</b>	David and Jane Elsmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO17911
<b>Full Name</b>	Dave Davies

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</b></p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
Include files	
Number	Question 19
ID	LPIO17966
Full Name	Mr Michael Burbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This depends on the scale of the development. If a large site is going to be developed then it should be done so that the infrastructure required such as schools, sports and leisure facilities and transport is constructed at the same time the housing. Failure to do this will put a strain on the existing facilities and allow promises for this investment to be broken due to “funding issues”. The facilities need to be developed alongside the demand not years afterwards which is often the case.</p>
Include files	

Number	Question 19
ID	LPIO18020
Full Name	mr Richard Lambert
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMENT) , my own views can be summarised in a handful of bullet point.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
Include files	
Number	Question 19
ID	LPIO18091
Full Name	Mr Graham Bright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

<p><b>Your response - Please add your response here</b></p>	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 19</p>
<p><b>ID</b></p>	<p>LPIO18148</p>
<p><b>Full Name</b></p>	<p>Peter and Cathy Davidson</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>No</p>
<p><b>Your response - Please add your response here</b></p>	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary</p>



	premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18205
<b>Full Name</b>	Nicky and Dave Hulse
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18258
<b>Full Name</b>	Gail Skelton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<p><b>Your response - Please add your response here</b></p>	<p>I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 19</p>
<p><b>ID</b></p>	<p>LPIO18318</p>
<p><b>Full Name</b></p>	<p>Terry and Jennifer Elliott</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>No</p>
<p><b>Your response - Please add your response here</b></p>	<p>We are members of the Grove Fields Residents Association and as such support their recommendations. We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding</p>

	<p>the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18486
<b>Full Name</b>	Melanie Llewellyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> </ul>

	<ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18532
<b>Full Name</b>	Mrs Juliet Chodzko
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.</b></p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>It needs to confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt]</li> <li>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18579
<b>Full Name</b>	Captain Andrew Cassels
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</b></p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18625
<b>Full Name</b>	Lindy Weinreb
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b><i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18672
<b>Full Name</b>	Hilary Abbott
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p>

	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18718
<b>Full Name</b>	Paul and Gillian Jenkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> </ul>

	<ul style="list-style-type: none"> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18764
<b>Full Name</b>	Berkhamsted Citizens
<b>Company / Organisation</b>	Berkhamsted Citizens
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b><i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>



	<ul style="list-style-type: none"> <li>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18812
<b>Full Name</b>	Lyndsay Slater
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still</li> </ul>

	apply and should not be abandoned for expediency and as such this paragraph should be removed
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18860
<b>Full Name</b>	Andrew and Margit Dobbie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18906
<b>Full Name</b>	Katherine Cassels
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</b></p> <p>...</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO18984
<b>Full Name</b>	Mrs Emma Robertson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19047
<b>Full Name</b>	Barbara Gainsley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</p> <p>Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.</p> <p>Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.</p>

	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</li> <li>•</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19104
<b>Full Name</b>	Bill Ahearn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I wish to register my objections to some of the proposals under consideration on the grounds they are simply to excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan</p>

	period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19162
<b>Full Name</b>	Ms Sarah Hain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19220
<b>Full Name</b>	Grove Fields Residents Association
<b>Company / Organisation</b>	Grove Fields Residents Association
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19277
<b>Full Name</b>	Marcus, Jane, Abigail and Jennifer Fox
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Our family ( 4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town's infrastructure.</p>

	<p>We feel strongly that green belt land should be preserved for future generations</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19331
<b>Full Name</b>	Stuart, Miranda & Melissa Kay
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan).</li> </ul>



	<p>Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</p> <ul style="list-style-type: none"> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19379
<b>Full Name</b>	Wai Tang and Greg Barfoot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please note we are aware that the Berkhamsted Residents Action Group (BRAG) has responded in full to the "Issues &amp; Options" consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.</p> <p>We wish to add our concerns to the DBC local plan issues and options consultation.</p> <p>We are particularly concerned about the following</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt]</li> <li>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> </ul>

	<ul style="list-style-type: none"> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19427
<b>Full Name</b>	Philippa Jones
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan</p> <p><b>Question 19</b></p> <p><b><i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt]</li> <li>4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>

	<ul style="list-style-type: none"> <li>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19482
<b>Full Name</b>	John Wignall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19539
<b>Full Name</b>	Kevin Cullen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<p><b>Your response - Please add your response here</b></p>	<p>Please refer to the attached report.(BRAG)</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 19</p>
<p><b>ID</b></p>	<p>LPIO19597</p>
<p><b>Full Name</b></p>	<p>Mark Lawson and Sharon Wilkie</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>No</p>
<p><b>Your response - Please add your response here</b></p>	<p>I do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that.</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan</p>

	<p>period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19653
<b>Full Name</b>	Vivienne Inmonger
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19712
<b>Full Name</b>	John Inmonger

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
Include files	
Number	Question 19
ID	LPIO19766
Full Name	Ben Barth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p><b>Question 19</b></p> <p><b><i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p>

	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> <li>• Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19835
<b>Full Name</b>	Jon Esson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have</p>

	otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19919
<b>Full Name</b>	Chris Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA )</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO19976
<b>Full Name</b>	mrs sue van rhee
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No



<p><b>Your response - Please add your response here</b></p>	<p>Please find attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 19</p>
<p><b>ID</b></p>	<p>LPIO20033</p>
<p><b>Full Name</b></p>	<p>Kate and Ben Marston</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>No</p>
<p><b>Your response - Please add your response here</b></p>	<p>As residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver</p>

	<p>a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20090
<b>Full Name</b>	Maurice and Christine O'Keefe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>We are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20147
<b>Full Name</b>	Sherry and Haydn Bond
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20205
<b>Full Name</b>	Dianne Pilkington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The</p>

	<p>local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20253
<b>Full Name</b>	Mr Peter Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> </ul>

	<ul style="list-style-type: none"> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20308
<b>Full Name</b>	David Clarke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p>

	<p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1020366
<b>Full Name</b>	Deborah Turnbull
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20414
<b>Full Name</b>	Jane Collis
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I would like to express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20475
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I am writing in response to the Issues and Options consultation.</p> <p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20523
<b>Full Name</b>	DR Brigitta Case
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I have attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p>



As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.

The 46 Questions have been eloquently answered by many and I support the answers given by both the **Berkhamsted Citizens' Association** and the **Berkhamsted Residents Action Group**. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.

BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46

**BRAG response to Question 19 (please note full document is attached to Q46)**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

**No**

- Agree brownfield sites must be released first but there are critical contradictions within this section
- It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
- 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
- Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised
- Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

Berkhamsted Citizens response

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

**No**

- Agree brownfield sites must be released first but there are critical contradictions within this section
- It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]
- 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted

	<ul style="list-style-type: none"> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> <li>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20570
<b>Full Name</b>	Christine Manning
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><b><i>Do you agree with the proposed approach to the timing of site delivery?</i></b></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt]</li> <li>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> <li>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites</li> </ul>
<b>Include files</b>	

Number	Question 19
ID	LPIO20606
Full Name	Ailsa Davis
Company / Organisation	HCC Development services, Property , Resources
Position	Principal Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As confirmed in the schedule of Green Belt Site Appraisals carried out by DBC which accompanies the Issues and Options consultation, the Green Belt releases do offer the potential to deliver key infrastructure. Those infrastructure needs should be factored in to masterplanning of the sites at the outset in order to maximise the chances of the sustainability objectives set out in the Sustainability Note and the opportunities which exist being successfully achieved.
Include files	
Number	Question 19
ID	LPIO20642
Full Name	Jane Hawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan</p>

	period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20698
<b>Full Name</b>	Keiron Wybrow
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20746
<b>Full Name</b>	Christopher Townsend
<b>Company / Organisation</b>	
<b>Position</b>	Councillor, Tring Town Council
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)  The important factor is securing and delivering the necessary infrastructure in a timely fashion as development takes place. In Tring the provision of employment land should precede the new dwellings.  Local input should be sought before determining the phasing.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20794
<b>Full Name</b>	Usha Kilich
<b>Company / Organisation</b>	Northchurch Parish Council
<b>Position</b>	Parish Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>Yes, but</b>  We agree in principle that brownfield sites should be developed before greenfield sites, however we do not agree with the selection of green field sites for proposed development.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20840
<b>Full Name</b>	Mr Iain Manson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	I have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.  <b>BRAG response to Question 19 (please note full document is attached to Q46)</b>  <b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i>  <b>No</b>

	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20916
<b>Full Name</b>	Mr Jake Storey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I live in Berkhamsted and have witnessed the size of the small town growing in an unsustainable manner. As a result I joined SYBRA and also now BRAG. I have attached the BRAG response to your proposals</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but</li> </ul>

	<p>when combined they become unbearably large for towns like Berkhamsted</p> <ul style="list-style-type: none"> <li>Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO20971
<b>Full Name</b>	Mr & Mrs J.D Battye
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents’ Action Group(BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG’s responses under our names so that a complete repetition of BRAG’s submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council’s submission.</p> <p>Q19 BRAG</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt]</li> <li>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan).</li> </ul>

Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted

- Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised
- Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

**Berkhamsted Town Council response**

**Question 19** *Do you agree with the proposed approach to the timing of site delivery?*

We agree that brownfield sites should be released first but there are critical contradictions within this section.

It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt].

- ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have a small effect but when combined they become intolerably large for towns like Berkhamsted. We strongly disagree with para 6.4.4 – it will always be easier and more attractive to developers to build on greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency. This paragraph should be removed.

Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21056
<b>Full Name</b>	julie owen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21121
<b>Full Name</b>	Sheron Wilkie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please find attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p>

	It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21165
<b>Full Name</b>	St Albans Diocesan Board of Finance
<b>Company / Organisation</b>	St Albans Diocesan Board of Finance
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• SADBDF supports the phased release of sites to control the delivery of housing through the Plan period.</li> <li>• There are two key concerns SADBDF would wish to raise with regard to delivery: (a) sites that require less infrastructure prior to delivery should be brought forward to the early stages of the Plan period; and (b) the implications of the Housing Delivery Test should be fully considered in the projection of housing delivery. The increased burden on Local Authorities to maintain a rolling supply of 5yrs of housing need will require authorities to prepare action plans when delivery falls below the required rate. Therefore, DBC should ensure that site deliverability is reliable and adequate supply of sites is maintained throughout the Plan period</li> <li>• SADBDF is aware of difficulty of delays experienced in delivery of allocated sites in the previous plan period and encourages the full support of members to allocations within the Plan, and use of Permission in Principle to ensure sites are not frustrated through the planning process</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21197
<b>Full Name</b>	Sarah Lightfoot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No

<p>Your response - Please add your response here</p>	<p><b>Question 19</b> <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites <b>must</b> be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted.</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be</li> <li>• <b>Strongly disagree with 6.4.4</b> – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is <b>why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance.</b> The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such <b>this paragraph should be removed</b></li> <li>• Berkhamsted has already contributed 34% above target, whilst Hemel is 21% below. 6.4.4 would increase this disparity – see Green Belt Site Appraisals that claim delivery in first 5 years – increasing the unfairness of the distribution and timing. Removing sites from Green Belt is an 'easy option' requiring little planning expertise!</li> </ul>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 19</p>
<p><b>ID</b></p>	<p>LPIO21249</p>
<p><b>Full Name</b></p>	<p>Sarah Lightfoot</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>Yes</p>
<p>Your response - Please add your response here</p>	<p>A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be taken into account. I strongly support their submission (below)</p> <p>The Chilterns Conservation Board would support a phasing approach that encourages the delivery of brownfield sites first.</p>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21320
<b>Full Name</b>	Antony Harbidge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19

<b>ID</b>	LPIO21366
<b>Full Name</b>	Helen Kington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21405
<b>Full Name</b>	James Good

Company / Organisation	Angle Property Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Question 19: Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><u>Response:</u></p> <p>No</p> <p><u>Details:</u></p> <p>APL agrees that the development of brownfield sites should be encouraged and prioritised. However, the Plan differentiates between brownfield sites and Green Belt sites. APL considers that the redevelopment of those brownfield sites should be prioritised, even though they are currently located within the Green Belt, especially where they are adjoining or closely related to settlements that offer employment and services.</p>
Include files	
Number	Question 19
ID	LPIO21424
Full Name	Mr R Smith and Mr A Lyell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><b>1.20 Question 19: Delivery of Housing - No</b></p> <p>1.20.1 The Landowners supports the phased release of sites to control the delivery of housing through the plan period</p> <p>1.20.2 There are two key concerns the Landowners would wish to raise regarding delivery; sites that require less Infrastructure prior to delivery should be brought forward to the early stages of the plan period; and the implications of the Housing Delivery Test should be fully considered in the projection of housing delivery. The increased burden on Local Authorities to maintain the rolling supply of 5yrs of housing need will require authorities to prepare action plans when delivery falls below the required rate. Therefore, DBC should ensure that site deliverability is reliable and adequate supply of sites is maintained throughout the plan period</p> <p>1.20.3 The Landowners are aware of difficulty of previous plan period in delivery of allocated sites and encourages the full support of members to allocations within The Plan, and use of Permission in Principle to ensure sites are not frustrated through the planning process</p>

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21496
<b>Full Name</b>	Hightown Housing Association
<b>Company / Organisation</b>	Hightown Housing Association
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Question 19 Do you agree with the proposed approach to the timing of site delivery? No</b></p> <p>In order to ensure the delivery of much needed housing, we believe the opportunity should be taken to enable the early release of available and deliverable Green Belt land. They should not be unduly held back or arbitrarily staggered.</p> <p>It is normally the case that allocated sites stagger themselves naturally either through delays due to ownership or other market considerations.</p> <p>The site at Grange Farm, Bovingdon is available and ready to be delivered. Our client is a Registered Provider of affordable housing and has been liaising with the option holders for this site. Both parties are keen to progress the development of this site early in the Plan period. Given the valuable contribution this site would make to much needed affordable housing and housing for older persons, this should not be unduly held back.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21519
<b>Full Name</b>	Mr Chris Briggs
<b>Company / Organisation</b>	St Albans City & District Council
<b>Position</b>	Spatial Planning Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Q.19 Site delivery – No</b></p> <p><b>13. Phasing new housing development</b></p> <p>It is appreciated that an NPPF-compliant (including future revisions) five year housing land supply policy context is very important to all Plans. If there is a very substantial step up in the level of housing development planned (as is likely), then the need for significant infrastructure investment and lead-times will need to be taken into account in phasing of development. This will likely require differential / stepped / phased land supply targets</p>

	over time. This will be an important issue throughout the 5 LPA HMA.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21546
<b>Full Name</b>	Mrs Valerie Silverton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I have read the proposals and strongly agree BRAG's responses.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21603
<b>Full Name</b>	Mr Charlie and Claire Laing
<b>Company / Organisation</b>	
<b>Position</b>	



<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p><b>GFRA Response to Question 19, full document attached to question 46</b></p> <p>It is our opinion at this point that any further release of Green Belt land to underpin supply is yet to be demonstratively proven by the Local Authority given outstanding investigative works that need to be undertaken in relation to brownfield land. As such the concentration until that point if satisfactorily concluded should be on undertaking a strategy that identifies and secures brownfield and non-Green Belt land to deliver a steady supply of new homes across the whole plan period; with a continued focus on bringing forward new brownfield sites to development across the plan period by increasing the regularity of strategic site appraisals and strategic housing land availability assessments.</p> <p>It is our opinion that in any instance this will encourage the gradual stream of brownfield sites across the plan period to be brought forward and avoid unnecessary premature allocation of Green Belt land that may have otherwise been satisfactorily delivered upon brownfield and underutilised sites across the plan period.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21646
<b>Full Name</b>	Silversaw Ltd
<b>Company / Organisation</b>	Silversaw Ltd
<b>Position</b>	
<b>Agent Name</b>	Mark Novelle
<b>Company / Organisation</b>	CBRE
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The approach set out historically seeks a greater control over the release of Green Belt sites which have been allocated for development, this was due to the significant quantum of brownfield and urban sites that could bring forward housing delivery. However, the context is</p>

	<p>changing and although brownfield sites will continue to provide a land supply this may not be as comprehensive as previously, furthermore brownfield sites are subject to development constraints and could also be restricted or delayed within the process.</p> <p>Therefore, we consider that this plan may be an opportunity for the Council to reassess the timing of delivery to ensure that housing delivery is not hindered through the steady release of sites. It is considered that there are some Green Belt sites which would bring forward significant housing delivery, infrastructure improvements and high quality Masterplanned development which would benefit DBC's strategic objectives.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21690
<b>Full Name</b>	Countryside Properties (UK) Ltd
<b>Company / Organisation</b>	C/O Bidwells
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• CPUK supports the phased release of sites to control the delivery of housing through the plan period.</li> <li>• There are two key concerns CPUK would wish to raise with regard to delivery; sites that require less Infrastructure prior to delivery should be brought forward to the early stages of the plan period; and the implications of the Housing Delivery Test should be fully considered in the projection of housing delivery. The increased burden on Local Authorities to maintain the rolling supply of 5rs of housing need will require authorities to prepare action plans when delivery falls below the required rate. Therefore, DBC should ensure that site deliverability is reliable and adequate supply of sites is maintained throughout the plan period.</li> <li>• CPUK is aware of difficulty of previous plan period in delivery of allocated sites and encourages the full support of members to allocations within The Plan, and use of Permission in Principle to ensure sites are not frustrated through the planning process.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21760
<b>Full Name</b>	Elizabeth Hamilton
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I have lived in my present house since 1996 and spent some of my childhood in the Borough, living in Berkhamsted from 1965 and attending Ashlyns School from 1966 to 1973.</p> <p>In my view the Consultation document fails to provide adequate justification for the growth rates proposed for the Borough. Dacorum has an up-to-date Local Plan, and although at the time of the Core Strategy EiP a review was agreed, there was and is no specific timetable for this.</p> <p>Paragraph 3.3.4 is misleading. The letter written on 7th June 2016 by Brandon Lewis, then Minister of State for Housing and Planning, remains Government policy. The key parts of this letter are as follows:</p> <p>‘Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries. However, we recognise that it is local authorities, working with their communities and with detailed local knowledge, which are best placed to decide the most sustainable, suitable and viable sites for new homes.’</p> <p>For the avoidance of doubt I have attached a copy of this letter.</p> <p>The protection of the Green Belt was restated by the Prime Minister on 15th November 2017, when it was reported in the Times that she ‘ruled out building in the Green Belt’. There was no change to Green Belt policy in the autumn 2017 Budget.</p> <p>Paragraph 3.7.3 refers to various government consultations in progress but none of these has been concluded. In particular without the outcome of the consultation on the right approach to calculating housing need it is difficult to form a judgement on the housing targets in this Consultation.</p> <p>Paragraph 3.3.4 is also misleading because it fails to recognise that other Local Planning Authorities in England have not planned to meet their housing needs in their Local Plans due to environmental constraints and those Plans have been found to be sound. A recent example is Adur District Council. There is no Green Belt in Adur but the Inspector found that the Council could not meet its full housing need because of the ‘significant constraints that exist’, one of which is the need to preserve the ‘local green gaps’. If this can apply to ‘local green gaps’ it applies even more powerfully to Green Belt which is accorded significantly greater protection under the NPPF. The Inspector also found that there are constraints to development within the wider Housing Market Area which includes Adur, one of which is the existence of the South Downs National Park.</p>

	<p>Paragraph 6.1.1 is misleading as there have been no further announcements following the Housing White paper consultation.</p> <p>Paragraph 6.1.2 is incorrect for the reasons set out above in my comments on Paragraph 3.3.4 citing the example of Adur District Council.</p> <p>Paragraph 6.1.14 refers to the recent consultation on calculating housing need but there have been no further announcements since the consultation. Some of the proposals in the consultation were widely criticised, as is acknowledged in paragraph 6.1.15.</p> <p>Question 16 asks which housing figure is most reasonable to use. My view is that the Core Strategy figure is reasonable. Even that figure will result in loss of over 80 hectares of Green Belt in the Local Allocations, which I do not agree with for the reasons already set out above relating to Green Belt. In my view the starting premise should be that the Green Belt will be protected with no further losses, in accordance with national policy.</p> <p>I am opposed to the issues raised in Section 6.4 for the reasons already set out in relation to the Green Belt.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21827
<b>Full Name</b>	W Lamb Ltd
<b>Company / Organisation</b>	W Lamb Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• It is unclear what the proposed approach. In light of the Council's increasing housing need compared to the adopted Core Strategy however, we do not consider it appropriate to stagger the release of large Green Belt sites in order to give priority for brownfield sites.</li> <li>• As has been acknowledged elsewhere in the consultation document, a significant number of brownfield sites have already been redeveloped and the Council will be increasingly reliant on the development of greenfield sites to meet its housing need. Where existing available brownfield sites have remained undeveloped, it is likely that there are other constraints which may continue to delay their delivery, such as land ownership/assembly issues or contamination etc. It is therefore not appropriate to delay the delivery of other (greenfield) sites which would make a valuable contribution to the Borough's housing need in the meantime. It is also important that existing and future residents have a wide choice of homes to ensure choice and competition in the market, in accordance with Section 6 of the NPPF.</li> </ul>

	<ul style="list-style-type: none"> <li>The consultation document acknowledges that larger sites will naturally be delivered over a number of years. Research undertaken by NLP4 demonstrates that larger sites can deliver more homes per year over a longer time period than smaller sites, but also have longer lead- in times. It is therefore important that the housing trajectory in the new Local Plan includes realistic assumptions about the rate at which larger housing sites will deliver, and if necessary allocate more sites. This will ensure that supply is maintained throughout the plan period, without unnecessarily constraining development through the staggered release of site.</li> <li>For instance, the Council indicates that the larger of these greenfield sites will also be required to deliver necessary key infrastructure. In these cases, it is likely that a certain level of residential development would need to come forward first to release the necessary funds to deliver this infrastructure, to ensure sites remain viable and deliverable in accordance with paragraph 173 of the NPPF</li> <li>Introducing phasing requirements delays delivery and increases uncertainty for landowners and developers, particularly where land is under time-limited option or promotional agreements. It is therefore unnecessary and potentially damaging for the delivery of such sites to be artificially constrained through staggered release or phasing requirements in the Local Plan. It is also contrary to the aims of the NPPF and recent Government White Paper in terms of speeding up the delivery of new housing.</li> </ul> <p>4 'Start to Finish: How Quickly to Large-Scale Housing Sites Deliver?' (NLP, 2016)</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21886
<b>Full Name</b>	Louis Quail
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Please see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the augment for building on greenbelt land should only be one of last resort , there are plenty</p>

	<p>of other options left before launching off this one way route .</p> <p>Berkhamsted Residents Action Group response:</p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognized.</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21923
<b>Full Name</b>	Roger Saller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perceptive on what made the town attractive and what is now at risk.</p> <p><b>BRAG response to Question 19 (please note full document is attached to Q46)</b></p> <p><b>Question 19</b>      <i>Do you agree with the proposed approach to the timing of site delivery?</i></p> <p><b>No</b></p>

	<ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21954
<b>Full Name</b>	Thomas and Margaret Ritchie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>I have not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council's response:</p> <p>We agree that brownfield sites should be released first but there are critical contradictions within this section.</p> <p>It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt].</p> <p>6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have a small effect but when combined they become intolerably large for towns like</p> <p>We strongly disagree with para 6.4.4 – it will always be easier and more attractive to developers to build on greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The</p>

	<p>'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency. This paragraph should be removed.</p> <p>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21989
<b>Full Name</b>	Waterside Way
<b>Company / Organisation</b>	Waterside Way Sustainable Planning Ltd
<b>Position</b>	
<b>Agent Name</b>	Mr Stephen Harris
<b>Company / Organisation</b>	Emery Planning Partnership
<b>Position</b>	Senior Consultant
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>Issue 11 deals with managing the release of housing sites. We consider that this can only be answered once the plan progressed in greater detail but our overarching position is that sites should not be managed unless there are good reasons such as improvements to infrastructure. We do not see any sequential preference to previously developed land as meeting Government policy and to meet the housing need in the plan period then Green Belt sites should be released at an early stage</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO21997
<b>Full Name</b>	Mr Paul Phipps
<b>Company / Organisation</b>	Whiteacre Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Not entirely. The Issues and Options document refers to 'staggering the releases of any large GB sites required'. We do not think that deliverable sites should be held back from playing an early part in delivering the housing required in the Borough, just because they are Green Belt releases.</p> <p>This point is particularly pertinent in Bovingdon, as <u>all</u> of the housing option sites are within the Green Belt. Were they to be artificially held back, then Bovingdon would not receive its much needed housing provision</p>



	<p>for many years, nor would its existing infrastructure issues be addressed rapidly.</p> <p>There is no need to artificially phase site releases over time, especially when the housing need is so pressing; and has been unmet for many years. Some sites will always come forward at a slower pace than others, for many and diverse reasons. Grange Farm is not subject to any factors or constraints which would delay its deliverability; and as such it is ready to be developed immediately.</p> <p>The Site Appraisal Document for Grange Farm indicates that it can deliver housing as soon as the plan is adopted, and planning consent granted, with which we fully agree.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO22013
<b>Full Name</b>	Millbank Land
<b>Company / Organisation</b>	Millbank Land
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>The Council has a duty to ensure they identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements and a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 (See ref 6 below). Previous capacity analysis (Strategic Housing Land Availability Assessment, 2015) indicates that there was capacity for just over 14,500 homes in the Borough. The Council has discounted a number of the sites identified as they are not deemed to be acceptable in terms of the Council's existing planning policies.</p> <p>It is estimated that there is capacity to provide around 10,940 homes from existing and planned sites that are consistent with existing planning policies. This falls significantly short of the meeting local housing needs of even the Government's draft figure of 602 dwellings per annum, and as discussed in response to Question 16, the Council should be aspiring to meet a much higher housing figure.</p> <p>The Council should consider allocating sustainable, greenfield sites that are capable of providing much needed housing in the Borough and are available to come forward early in the plan period.</p> <p><i>(ref - 6 NPPF, para. 47)</i></p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO22034

<b>Full Name</b>	Gallagher Estates
<b>Company / Organisation</b>	Gallagher Estates
<b>Position</b>	
<b>Agent Name</b>	Mrs Hanna Staton
<b>Company / Organisation</b>	Pegasus Group
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• Whilst it is understood that the Council is concerned about the provision of infrastructure to support development, the proposed policy of staggering the release of Green Belt sites is not agreed as it could threaten the delivery of sufficient development to meet local needs should the earliest allocated sites not come forward at the assumed rates.</li> <li>• As highlighted above, recent research demonstrates that care should be taken in making assumptions on the time and delivery-rate of large-scale development sites. Lapse rates, lead-in times and build-out rates combine to threaten the delivery of development and lead-in times for larger sites, which can deliver the most homes per year and important infrastructure, are particularly lengthy. When planning the housing and infrastructure trajectory for the emerging Local Plan, the larger sites should therefore be planned to come forward as soon as practically possible.</li> <li>• It is recommended that the Council errs on the side of allocating more sites of a variety of sizes and types, to enable supply to be maintained throughout the plan period. It is noted that the Local Plans Expert Group suggested that additional land, equivalent to delivering 20% of the overall dwelling requirement, is added to the supply, to provide a contingency of land to be used as and when necessary during the plan period. It is suggested that such an approach would improve the robustness of the Local Plan, however, it is accepted that finding sufficient land to meet the highest dwelling requirement represents a significant challenge without looking for additional land.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO22101
<b>Full Name</b>	Crest Nicholson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	Sarah Moorhouse
<b>Company / Organisation</b>	Lichfields
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	There may be good reasons to stagger the release of some large Green Belt sites (reflecting in part the requirements for the prior provision of infrastructure) but this does not apply to all Green Belt sites. As stated by DBC (para. 6.4.4), housing need is likely to substantially increase and some identified Green Belt sites in the Schedule of Site Appraisals could be delivered at an early stage to assist in meeting this housing need. This includes land adjacent to Blegberry Gardens, Berkhamsted (Site Be-h6) which the draft Schedule of Site Appraisals (October 2017) identifies (pg 59) is capable of delivering around 100 homes in the period to 2021.
<b>Include files</b>	<a href="#">Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Repts (13.12.17).PDF</a>
<b>Number</b>	Question 19
<b>ID</b>	LPIO22134
<b>Full Name</b>	Mrs Hayley Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO22178
<b>Full Name</b>	Mr Peter Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO22223
<b>Full Name</b>	Miss Sophie Gillard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1022458
<b>Full Name</b>	Ashleigh Michnowiec
<b>Company / Organisation</b>	Harrow Estates plc
<b>Position</b>	
<b>Agent Name</b>	Mrs Sam Ryan
<b>Company / Organisation</b>	Turley Estates
<b>Position</b>	Director
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p>Harrow Estates plc agree that it is important to ensure that the borough meets its housing needs from the outset, and notes that the (significantly lower) annualised requirement of the adopted development plan has not been met by following a strategy of staggered release. It is also clear that the FOAN in the new local plan is at the upper end of the range of growth Options set out in the consultation document, and that there is a particular need to identify a significant proportion of new housing in Tring to address affordability issues and evidence of population imbalance in the town (see response to Q33 and accompanying Turley Local Needs Assessment).</p> <p>Tring is highly constrained due to the existing urban grain and there is limited scope to accommodate any new housing within the settlement boundary; this was clearly evidenced through the Core Strategy and recent examination of the Site Allocations DPD. Notably the Local Allocation in Tring is one of only two scheduled for early release in recognition of the limited availability of sites in the town. The level of housing development and associated facilities required to meet the future needs of Tring can only be accommodated through an expansion of the town into the Green Belt.</p> <p>Harrow Estates plc controls c.100ha of land to the east of Tring. A Vision Document has been prepared to demonstrate how that land could accommodate a sustainable urban expansion for up to 1400 dwellings, together with a new spine / link road, community facilities and open space. That land should be released for development upon adoption of the new local plan as it is the only realistic option to ensure that the development needs of the town will be met in the short - medium term.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1022500
<b>Full Name</b>	Mr & Mrs Lisa-Lotte & Henrik Hansen
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Please find below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below)</b></p> <ul style="list-style-type: none"> <li>• Agree brownfield sites must be released first but there are critical contradictions within this section.</li> <li>• It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt]</li> <li>• 2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted</li> <li>• Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.</li> <li>• Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1022550
<b>Full Name</b>	Mrs C Longbottom
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>I support all answers and comments to the Issues &amp; Options Consultation document noted on the Berkhamsted Town Council website</b></p> <p>We agree that brownfield sites should be released first but there are critical contradictions within this section.</p> <p>It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt].ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have a small effect</p>

	<p>but when combined they become intolerably large for towns like</p> <p>We strongly disagree with para 6.4.4 – it will always be easier and more attractive to developers to build on greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency. This paragraph should be removed.</p> <p>Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO22583
<b>Full Name</b>	Berkhamsted Schools Group
<b>Company / Organisation</b>	The Berkhamsted Schools Group
<b>Position</b>	
<b>Agent Name</b>	Kevin Rolfe
<b>Company / Organisation</b>	Aitchison Raffety
<b>Position</b>	Group Director, Development & Planning
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Yes. However it would be useful if the council were to define what constitutes a “large” green belt site, as the consultation proposes that they be released on a staged basis, whereas small green belt sites could come forward earlier to meet housing need. The evidence suggests that housing need is likely to increase substantially and we consider that any site that does not have a specific requirement for new infrastructure to be provided and that brings forward benefits (for example Site Be-h2 Haslam Fields) should be allowed to come forward without delay to meet housing need.
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO22620
<b>Full Name</b>	Mr & Mrs Mehew
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	We write as residents of [REDACTED] [REDACTED]

in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) (see comments LPIO18384, 18385) and the draft response prepared by Berkhamsted Town Council.

## Berkhamsted Town Council Response:

We agree that brownfield sites should be released first but there are critical contradictions within this section.

It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt].

6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have a small effect but when combined they become intolerably large for towns like Berkhamsted.

We strongly disagree with para 6.4.4 – it will always be easier and more attractive to developers to build on greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency. This paragraph should be removed.

Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.

<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LPIO22697
<b>Full Name</b>	Lewis Claridge
<b>Company / Organisation</b>	NHBE
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>Question 19 – Do you agree with the proposed approach to the timing of site delivery?</b></p> <p>Yes. The need to ensure infrastructure, services and facilities are planned and delivered with new development is referred to.</p>

	<p>The proposed approach is not clear, but appears to balance the need to ensure a constant 5-year land supply and managing the impacts of new development.</p> <p>It is important to time and sequence the delivery of housing sites to ensure that necessary supporting infrastructure and infrastructure upgrades are identified and can be delivered in a timely way. The Local Plan should also seek to co-ordinate site selection and phasing to enable any needed larger scale infrastructure to be funded and delivered. An incremental or piecemeal approach to infrastructure improvement will not be an adequate solution to the scale of development being proposed under any of the growth options. A cumulative approach to assessing impact and infrastructure need is required on all the sites, as the Site Appraisals indicate.</p> <p>We would welcome the council's indicated approach of thinking from early stages of the infrastructure needs and masterplanning safeguarded sites for post 2036. Likewise masterplanning and supporting work and investigations should start in good time on any sites expected to come through towards the end of the plan period or which are likely to be more challenging.</p>
<b>Include files</b>	
<b>Number</b>	Question 19
<b>ID</b>	LP1022804
<b>Full Name</b>	Mr Patricia Wheway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	<p><b>The costs of delivering key infrastructure improvements are not given in the consultation, and must be a key factor for determining the timing of site deliveries.</b></p> <p><b>Given Brexit uncertainties new building should be concentrated at least initially at the single large site adjoining north Hemel Hempstead</b></p>
<b>Include files</b>	